

# Written evidence on the Circular Economy Bill

## Friends of the Earth Scotland

### August 2023

#### About Friends of the Earth Scotland

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We work in Scotland for socially just solutions to environmental problems and to create a green economy; we campaign to end the degradation of our environment and to create a society which cherishes and protects the natural world on which we depend; we think globally and act locally, enabling people to take individual and collective action.

#### Summary

Friends of the Earth Scotland welcomes the introduction of the Circular Economy Bill as a crucial opportunity to make Scotland's resource use fair and sustainable by 2045. However, the draft Bill must be substantially strengthened to achieve the stated aim of the Scottish Government to introduce "measures that require primary legislation to transition to a circular economy and modernise Scotland's waste and recycling services" and to develop fair and sustainable resource use in Scotland.

In particular, the following changes are required:

1. Greatly strengthen and clarify the provision for **circular economy targets** so that they are mandatory, not optional, and that the targets must include **carbon-based and material-based consumption reduction targets**;
2. Align the circular economy strategy with domestic just transition principles and global just transition goals to '**do no harm**';
3. Ensure monitoring and reporting mechanisms are fit for purpose, in particular put in place the required **independent expert scrutiny** of progress; and
4. Significantly strengthen the provision for **local authority recycling targets**.

As acknowledged by the Scottish Government, "sustainable consumption and production are essential for Scotland's transition to a low-carbon and green economy, which will meet Scotland's obligations to tackle the twin climate and nature emergencies."<sup>1</sup> In Scotland, we use more than twice the sustainable limit of materials<sup>2</sup> but the impact of this consumption on people and the environment is often hidden. Only by honestly accounting for our global impact, can Scotland play its part in a truly sustainable future.

In a circular economy, materials are properly valued, and they are reused as much as possible before being responsibly disposed of. A circular economy is not just about asking people to buy less stuff and recycle more; it requires system change for every economic sector and a just transition domestically and globally. Across the Scottish economy, we should take no more resources than needed and, when resources are taken, this must be done in a way which minimises harm.

Scotland's **climate change policy framework** should be used as a template for the circular economy, including: an overarching strategy; science-based targets linking to quantified sector level plans; mechanisms for reporting and scrutiny; properly resourced independent review; and just transition safeguards built in. The Circular Economy Bill must create and introduce this framework as soon as possible.

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<sup>1</sup> Scottish Government (2023) [Circular Economy \(Scotland\) Bill policy memorandum](#)

<sup>2</sup> Zero Waste Scotland (2023) [Material Flow Accounts for Scotland](#)

## Detailed response

### 1. Consumption reduction targets

When the Scottish Government consulted on the Circular Economy Bill in 2022, 86% of responders supported consumption reduction targets.<sup>3</sup> However, the draft Bill only includes material consumption targets as one of four possible optional targets for the circular economy. Strong consumption-based targets are a fundamental requirement to driving sufficient progress towards a circular economy. This section explains why and how such targets should be written into the Bill.

#### 1.1 Reporting consumption emissions isn't enough to reduce them

The Scottish Government has been required to report consumption carbon emissions annually since the introduction of the Climate Change (Scotland) Act in 2009, over a decade ago.<sup>4</sup> However, regular reporting has not been enough to significantly reduce emissions. In its latest report to the Scottish Parliament,<sup>5</sup> the Climate Change Committee highlighted that Scotland's consumption emissions *grew* 3% in 2018, rather than reduced. What reporting these consumption emissions has done, is show that focusing targets only on domestic decarbonisation strategies cannot end Scotland's contribution to climate change. **Reporting consumption emissions is not enough to stimulate the required action, targets are needed to guide change.**

The Scottish Government has claimed that the carbon footprint estimates it has made annually for over a decade are not well enough understood to create consumption-based targets. This contradicts claims from independent academics, including those involved in the calculations of UK and Scottish Government carbon footprint reporting, that such an approach is a credible basis for targets.<sup>6</sup> In 2020, WWF, working with researchers from the University of Leeds, concluded that consumption emissions reporting "is complementary to the existing framing of territorial emissions which follow agreed guidance from the Intergovernmental Panel on Climate Change".<sup>7</sup> The data is now sufficiently developed to set targets and can be further refined as it becomes increasingly integrated into government policy.

#### 1.2 Gaps weaken Scotland's existing climate mitigation efforts

Scotland's existing climate targets are based on domestic emissions, rather than consumption-based emissions which include the emissions from Scotland's imports as well. Excluding imports has made Scotland's climate mitigation efforts less effective as **Scotland's domestic emission targets can be lowered by moving activity outside of Scotland**, rather than by reducing global demand. The Scottish Government's own carbon reporting trends indicate that this is happening: whilst domestic emissions have fallen, emissions due to imports have been steadily rising. In 2019, 58% of Scotland's carbon footprint emissions came from imports.<sup>8</sup>

Not only can this gap (sometimes known as carbon leakage) increase global emissions, but it can also have negative economic impacts too, as **economic activity is offshored** – sending both emissions and jobs overseas. For example, when Ravenscraig steel mill closed in 1992, 3.5 million tonnes of carbon were wiped of Scotland's carbon balance sheets.<sup>9</sup> But Scotland's demand for steel did not reduce. It has continued to grow, leading to a rise in imports which could be even more carbon intensive.

Zero Waste Scotland estimates that processing Scottish scrap steel in a modern plant in Scotland, could create 665 jobs and add £389m to Scotland's economy but requires a "strategic decision at

<sup>3</sup> Scottish Government (2022) [Circular economy bill Consultation Analysis](#)

<sup>4</sup> Scottish Government (2023) [Scotland's carbon footprint 1998-2019](#)

<sup>5</sup> Climate Change Committee (2022) [Progress in reducing emissions in Scotland, 2022 report to Parliament](#), page 18

<sup>6</sup> For example, CREDS (2022) [New research shows how ambitious energy efficiency targets could be applied to more sectors of the UK economy to accelerate energy independence and climate stability](#)

<sup>7</sup> WWF (2020) [Carbon footprint: exploring the UK's contribution to climate change](#)

<sup>8</sup> Scottish Government (2022) [Scotland's Carbon Footprint 1998-2019](#)

<sup>9</sup> Scottish Government (2012) [Scottish greenhouse gas emissions 2010](#)

government level".<sup>10</sup> Such an approach would increase emissions *within Scotland* but *reduce global carbon emissions* overall. These types of policies, where material processing is brought back within Scottish borders using green technology, only makes sense if consumption-based emissions are considered alongside domestic ones.

**Introducing carbon consumption reduction targets would close the carbon leakage gap in existing domestic carbon targets.** Decision makers would have better oversight of Scotland's global impacts and solutions with genuine global reduction capabilities would be promoted.

### *1.3 Scottish demand creates serious and extensive impacts globally*

The social and environmental impacts of Scotland's material demand are serious and extensive across the supply chain.<sup>11</sup> Extraction and production for products consumed in Scotland, from electronics to clothing and construction materials, are associated with serious human rights abuses, conflicts and disruption of communities, labour abuse and environmental destruction from carbon emissions to biodiversity loss and pollution. Consumption reduction targets are needed to properly account for and reduce the global impact of Scotland's consumption.

**If the global social and environmental impacts created by material extraction and production for Scottish demand are not considered, the aim of Scotland's climate policies, to reduce our climate impact, are compromised.** Creating a net zero economy within Scotland will be in vain if this is done at the expense of the lives of people in the Global South and emissions reduction on a global level.

### *1.4 Lack of material consideration in policy making risks failure of those policies*

Scottish policies often ignore the material demands created by their plans. This creates a risk of failure, if the materials required to meet those policies cannot be obtained.

For example, the Energy Strategy and Just Transition Plan,<sup>12</sup> currently being developed by the Scottish Government, does not say how much material is needed for the energy transition or how they will be obtained. This is despite the risk, acknowledged by Government, that supply of materials will affect the delivery of the energy transition.<sup>13</sup> A recent mapping exercise, funded by the Scottish Government, estimates that 241Mt of materials will be required to transform the Scottish energy infrastructure by 2050.<sup>14</sup> Scotland's total material consumption in 2018 was estimated at 105 Mt,<sup>15</sup> meaning that the estimated amount of materials needed solely to complete Scotland's energy infrastructure plans is more than double the country's entire annual material consumption. Another analysis by Catapult and Zero Waste Scotland estimates that the steel required for offshore wind turbines in Scotland will be 14 times greater than the amount of steel already used in Scotland's offshore wind turbines today.<sup>16</sup> It is unrealistic, irresponsible, and immoral to assume that Scotland will be able to obtain such vast quantities of materials.

Material requirements are not properly considered in any of Scotland's major policy interventions, either developed or under development, designed to transform Scotland's future. From the Climate Change Plan to the National Strategy for Economy Transformation and the National Planning Framework 4, there is an underlying and deeply flawed assumption that the materials required to build our future will be available in unlimited quantities. It is also possible that materials are available but so costly that Government plans are still impossible to complete.

<sup>10</sup> Zero Waste Scotland (2023) [Circular steel in Scotland](#)

<sup>11</sup> FoES (2023) [Unearthing Injustice](#)

<sup>12</sup> Scottish Government (2023) [Draft Energy Strategy and Just Transition Plan](#)

<sup>13</sup> <https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-10-01-2023?meeting=14079&iob=127520#2133>

<sup>14</sup> ZWS (2023) [Energy Infrastructure Materials mapping](#)

<sup>15</sup> Zero Waste Scotland (2023) [Material Flow Accounts](#)

<sup>16</sup> Catapult and Zero Waste Scotland (2023) [End of life materials mapping for offshore wind in Scotland](#) (table 16)

Consumption reduction targets would force policy makers to take more consideration of the material impacts of policies as they are developed. Decarbonisation pathways for energy and transport systems would be based on fairer and more realistic levels of material consumption.

### *1.5 Keeping pace with other countries*

Introducing consumption reduction targets would also ensure Scotland keeps pace with developing European legislation. In 2021, the European Parliament voted to create binding, science-based targets for material use and consumption footprint<sup>17</sup> and in 2022, Sweden voted to introduce carbon consumption reduction targets.<sup>18</sup> Austria has set consumption reduction targets, pledging to cut its material footprint by 80% by 2050 to 7 tonnes per capita.<sup>19</sup>

### *1.6 Carbon and material-based targets are both needed*

Scotland's existing climate targets are based on greenhouse gas emissions and set in primary legislation. **To close the gap created by excluding imports from Scotland's current climate targets, the consumption reduction target needs to be of equal standing and based in the same units, meaning carbon-based consumption reduction targets set in primary legislation and measuring greenhouse gas emissions are required.**

Material consumption reduction targets, as well as carbon-based ones, are also important. Climate change is not the only ecological crisis that we face – there are many, from biodiversity loss to soil erosion. These crises share a common underlying cause – overconsumption of the Earth's natural resources. In Scotland, we consumed over 100 million tonnes of materials in 2018 alone<sup>20</sup> and globally, material consumption exceeded sustainable limits decades ago.<sup>21</sup>

Scotland's Material Flow Accounts were first published by Zero Waste Scotland in 2021, for the years 2011 to 2017, and have since been updated to include 2018 estimates. These show that Scotland's material footprint (a consumption-based measure, similar to a carbon footprint, which estimates the average amount of materials used by one person in a year) increased from 18 to 19 tonnes per person between 2017 and 2018. A material footprint target which aims to reduce resource consumption will act as a general target for supporting progress towards wider global ecological sustainability.

### *1.7 What should Scotland's consumption reduction targets look like?*

Friends of the Earth Scotland recommends the following statutory and science-based targets are adopted in the Circular Economy Bill:

#### **Carbon-based, statutory consumption reduction targets**

Scotland should adopt a target to reduce its global carbon footprint to net zero by 2045, with an interim target of 75% by 2030, based on 1998 levels, with annual targets towards these goals.

#### **Material-based, statutory consumption reduction targets**

Scotland should adopt a target to reduce its material consumption to 8 tonnes per person per year by 2045 (57% reduction), with an interim target of 13 tonnes per person per year (30% reduction) by 2030, based on 2017 levels, with regular progress reports towards these goals.

At a minimum, carbon-based consumption targets should be set in the primary legislation of the Circular Economy Bill, just as existing domestic carbon targets are set in the primary legislation of

<sup>17</sup> European Parliamentary News (27<sup>th</sup> January 2021) [MEPS call for binding 2030 targets for material use and consumption footprint](#)

<sup>18</sup> Balken Green Energy News (2022) [Sweden introduces imported goods emissions in country's climate targets](#)  
<https://friendsoftheearth.eu/news/austrias-new-years-resolution-wellbeing-within-planetary-boundaries/>

<sup>20</sup> Zero Waste Scotland (2020) [Material Flow Accounts for Scotland](#)

<sup>21</sup> Hickel et al. (2022) National responsibility for ecological breakdown: a fair share assessment of resource use 1970-2017  
[https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(22\)00044-4/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(22)00044-4/fulltext)

the Climate Change Act. **If carbon-based consumption targets are not set in the primary legislation for the Bill, then there should be provision that the Scottish Government *must* set statutory targets in secondary legislation as soon as possible and that these must include carbon-based consumption measures.**

The targets should cover all of Scotland’s material use, not just waste material. The draft Bill includes the possibility that targets would cover only waste rather than measures which include the whole life cycle of products, such as consumption targets. Waste material accounts for just 12% of the 100Mt total material consumed by Scotland in 2018 and 15% of the carbon in our materials.<sup>22</sup> Waste-based targets would not cover enough of the life cycle of products consumed by Scotland to be effective at reducing the impacts of our material use.

The Scottish Government have argued that it does not have the power within its devolved responsibilities to introduce the required policies to meet consumption-based targets. Annex 1 of this document lists the wide range of policies which would contribute to reducing Scotland’s consumption and which are within the Scottish Government’s control to implement. This list of policies demonstrates the need for a national consumption reduction target which will ensure circular economy principles are adopted across all central government departments, local government and all sectors of the economy, as required.

In addition, no single country that trades with other nations has complete control over its consumption emissions. The key to reduction will be to find new ways to work with other internationally to find fair and sustainable path to material consumption together. As a net importer nation in the rich Global North, Scotland consumes more than most. Our consumer influence is a power diplomatic tool which can be used, working with others, to mitigate climate change and the global ecological crisis. By co-operating with other nations which are also mitigating the impacts of consumption, Scotland can reduce its consumption impacts to sustainable levels.

***Recommended changes to the CE Bill***

The primary legislation of the Bill should include statutory, science-based, carbon and material consumption reduction targets for Scotland which will support the creation of a Scottish circular economy by 2045.

If only provision for targets is included in the Bill, then a mandatory requirement for the Scottish Government to create targets in secondary legislation is required. The Bill must require that these targets include, most importantly, carbon-based consumption reduction targets, and also material consumption reduction targets.

**Table 1. Summary of changes required in the CE Bill on circular economy targets**

Section of the CE Bill	What is in the draft Bill?	What changes are needed?
6 (1)	Provision for CE targets, if adopted, in secondary legislation	Targets are set in primary legislation, which should be science-based and aim to create a CE in Scotland by 2045
6 (1)	Provision for CE targets is optional	CE targets are mandatory (change “may” to “must”)
6 (3) (a)	CE targets may relate to one or more of consumption of materials/reuse/recycling/waste	CE targets must include carbon-based consumption targets and material-based consumption targets.

<sup>22</sup> ZWS Material Flow Accounts and Carbon Metric for all waste 2018, and Scottish Government (2022) Carbon footprint for 2018

## 2. Just Transition provisions

There is a shocking lack of consideration of the need to ensure the transition to a Scottish circular economy is just. A just transition is where workers and communities affected by an economic change are properly included in the decision-making process, and supported through changes, to minimise harm and impacts on lives and livelihoods.

A circular economy will affect every sector of the Scottish economy, all Scottish consumers and millions of people globally who work to extract materials used in Scotland's economy. The Scottish Government has recognised that a just transition is vital in creating a sustainable future meaning the transition to a circular economy must be fair to those people most affected.

### 2.1 *The transition to a circular economy in Scotland should be just*

From retail workers to waste collectors and communities affected by oil and gas decommissioning, the way we change our material use will affect people across Scotland. The Scottish Government recognises that for decarbonisation plans to be successful, the people most affected by them must be at the heart of the required changes. The same is true if a circular economy transition is to be a success.

The single reference to alignment with the Climate Change Plan in the Circular Economy Bill is not enough to ensure just transition is given an appropriate level of significance in the development of a circular economy in Scotland. Including just transition principles directly in the Circular Economy Bill is needed to ensure the importance of a just transition to a circular economy for workers and communities, which has been largely overlooked until now, is recognised.

### 2.2 *Scotland's leading role in creating fairer supply chains*

Scottish consumption currently results in serious and extensive harm to people and communities across the world. Friends of the Earth Scotland's *Unearthing Injustice* report, written by the London Mining Network, traced the supply chains of two materials critical to Scotland's energy transition, lithium and steel and found evidence of social conflict at every stage of extraction and production.<sup>23</sup> For example, lithium mining in Chile, where the material for a substantial proportion of Scotland's rechargeable batteries is likely to come from, is causing labour abuses and water shortages for local communities.

As the Just Transition Commission notes in its recent report: "Scotland's current position as an advanced economy was gained through the historic exploitation of fossil fuels, and indeed the natural resources of formerly colonised regions. In line with the UNFCCC principle of Common but Differentiated Responsibilities and Respective Capabilities, there is a duty for Scotland to move faster in cutting emissions and to use our voice and resources to create an enabling environment for every region and nation to achieve a just transition."<sup>24</sup>

The Commission calls for a principle of 'do no harm' as a strategic priority for Scotland's Just Transition: "Commitment to an international just transition means that Scotland's just transition should not be a trigger for negative economic, climate or social outcomes in other parts of the world, particularly in the Global South where people are already bearing the disproportionate burden of a crisis they did not create. Scotland's national just transition strategy must ensure that objectives are not met by transferring carbon emissions, exploitation, human rights abuses or economic precarity to other jurisdictions."

**Scotland's circular economy strategy must implement an overarching principle of 'do no harm' internationally, as called for by the Just Transition Commission.** The Circular Economy

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<sup>23</sup> FoES (2023) [Unearthing Injustice](#)

<sup>24</sup> <https://www.gov.scot/publications/making-future-initial-report-2nd-transition-commission/>

Bill should recognise the importance of global just transition principles to achieving a circular economy which is just and sustainable.

The just transition principles in the Climate Change (Scotland) Act only cover domestic considerations. The Circular Economy Bill must be strengthened to include global as well as domestic just transition aims as a requirement in the circular economy strategy.

**Recommended changes to the CE Bill**

The Circular Economy Bill must directly align to domestic and global just transition principles.

**Table 2. Summary of changes required in the CE Bill on just transition provisions**

Section of the CE Bill	What is in the draft Bill?	What changes are needed?
After 1 (2) (d)	There is no requirement for ‘do no harm’ or global just transition principles in the CE strategy	Introduce a requirement that the CE strategy includes an aim to ‘do no harm’
After 1 (5) (a)	Domestic just transition principles are not specifically required	Introduce a requirement that the circular economy strategy must be consistent with the Just Transition principles as set out in Section 35 of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

**3. Independent scrutiny, monitoring and reporting**

Progress towards a circular economy is vital to creating a future in Scotland which is sustainable and fair. It is too important to fail, and the tight timeframe required for success means that significant progress must begin immediately, increase rapidly and be sustained for several decades. Mechanisms for monitoring and reporting, especially around independent scrutiny, which are judged necessary to ensure progress in Scotland’s climate legislation, are missing from the Circular Economy Bill.

*3.1 A new Circular Economy Public Body is needed*

Independent and expert review of progress towards targets is needed. 60% of respondents to the Circular Economy Bill consultation supported the introduction of a circular economy public body.

The Scottish Government has argued against the introduction of a new public body to monitor progress towards a circular economy because “most of the functions identified in the consultation are already undertaken by Zero Waste Scotland and Scotland already has an independent body, Environmental Standards Scotland (ESS), which was recently established to monitor the effectiveness of environmental law in Scotland and public authorities’ compliance with it.”<sup>25</sup> The Scottish Government has transitioned Zero Waste Scotland to a public body and it has been classified as such by ONS since April 2023.

However, the most important function of such a body would be independent review and monitoring, which Zero Waste Scotland cannot do, as it is not independent of the Scottish Government. ESS does not have the correct powers, expertise or resources to perform this function appropriately. Therefore, a new public body is needed to fulfil the requirement for independent scrutiny which is vital to the success of circular economy progress in Scotland.

<sup>25</sup> Scottish Government (2023) [Circular Economy \(Scotland\) Bill Policy Memorandum](#) (131)

The Climate Change targets are monitored by the Climate Change Committee and the Circular Economy targets are of equal importance and so should also be independently monitored by a body which has the authority and resources to properly do so.

### **Recommended changes to the CE Bill**

Within the CE Bill, create a new public body to advise and monitor the Scottish Government's progress towards circular economy targets.

**Table 3. Summary of changes required in the CE Bill on independent scrutiny**

Section of the CE Bill	What is in the draft Bill?	What changes are needed?
After 1 (5)	There is no requirement for independent scrutiny of the CE targets	Create a new circular economy public body to review progress
7 (1) (a) and (b)	Secondary regulation will be used to set out monitoring and reporting arrangements	Monitoring and reporting requirements must be laid out in the primary legislation of the CE Bill

## **4. Recycling targets for Local Authorities**

Friends of the Earth Scotland welcomes the introduction of statutory recycling targets for local authorities on household waste. Scotland is expected to fail to meet its 2025 (non-statutory) recycling targets and it is important to learn from this, as we do not have time to make such mistakes again.

### *4.1 National as well as local action is needed*

The draft Bill creates provisions to impose recycling targets on each individual local authority. However, there is no acknowledgement that a shared national strategic approach is needed to guide local action.

This lack of national strategy has been one of the key missing elements of the approach which has led to Scotland's failure to meet its current recycling targets. One of the conclusions from the independent review on incineration, conducted for the Scottish Government in 2022 found that "the locations of operational and planned incineration facilities have emerged organically and are not necessarily in the right places strategically."<sup>26</sup> To correct this, the review suggested strategic planning at a national level was required (Recommendation 5) and this was fully accepted by the Scottish Government.

National recycling targets are needed which relate to household waste recycling targets for local authorities in the draft Bill.

### *4.2 Setting recycling targets should be mandatory*

A consistent, high-quality and functional recycling service for all Scottish citizens is essential for achieving a circular economy and this must be reflected in the Bill. The Scottish Government rightly states that targets must be "achievable and fair for local authorities" but it also has a direct duty to Scottish citizens and pressing climate responsibilities to ensure that recycling targets drive rapid progress towards a high quality and standardised service, which promotes the lowest impact waste management options over other disposal methods. Measures, such as the levy on black bin waste

<sup>26</sup> <https://www.gov.scot/publications/stop-sort-burn-bury-independent-review-role-incineration-waste-hierarchy-scotland/documents/>

to be introduced in Ireland this year, could be used to compliment such targets and would be a useful addition to the Bill.<sup>27</sup>

#### 4.3 A recycling target should be set for no later than 2030

Unfortunately, the lack of progress to date on improving recycling services, means setting a sufficiently ambitious target for earlier than 2030 would be unrealistic. However, the Bill should balance this against the urgency of the climate crisis and the need for certainty. Given that Scotland has had a progressive recycling target for many years, introducing new recycling targets does not represent a change in direction of government policy. Therefore, the draft bill requirements state 2030 as the year in which a recycling target should be set, removing the possibility that a target is imposed after this date and creating more certainty for stakeholders.

#### 4.4 Concessions for individual LAs should not jeopardise national progress

The concession in the Bill that allows individual local authorities to be granted different targets fundamentally weakens them. Granting exceptions to any local authorities lowers the national recycling rate, eroding progress, if that is not made up in other ways. **To ensure that ambitions for a circular economy are not jeopardised, there must be a condition added to the Bill that any concessions to individual local authorities around their recycling targets must be made up by other local authorities, so as not to affect the overall national recycling target.**

#### **Recommended changes to the CE Bill**

The recycling target requirements in the Bill should be revised so that:

- The Scottish Government must set national recycling targets which align with local authority targets;
- The local authority targets are set for 2030 and no later; and
- The Bill includes a requirement that the national recycling target is not affected if individual local authority are granted concessions to achieving it.

**Table 4. Summary of changes required in the Circular Economy Bill on recycling targets**

Section of the CE Bill	What is in the draft Bill?	What changes are needed?
13 (2) (1)	Recycling targets would be set at the level of local authorities only	Local authority targets are tied to a national level recycling target
13 (2) (1)	Recycling targets are optional	Scottish Government are required to set recycling targets (change “may” to “must”)
13 (2) (2)	Targets are set no earlier than 2030	Target must be set in 2030 (and no later)
13 (5) (a)	The target can be changed for “different purposes, areas or local authorities”	There is a requirement that progress towards the national recycling target must not be affected if concessions are granted

<sup>27</sup> <https://www.gov.ie/en/press-release/75262-introduction-of-new-environment-levies-will-incentivise-recycling-and-help-ireland-meet-our-eu-waste-targets/#:~:text=The%20legislation%20introduces%20a%20waste,to%20€85%20per%20tonne>

## Annex 1

### Consumption reduction policies within the Scottish Government’s power to introduce

Consumption reduction policies	Examples
Creating a circular economy (making better use of the materials we have)	<ul style="list-style-type: none"> <li>• Scottish Extended Producer Responsibility schemes, wider take back requirements and product specifications for product categories from textiles and mattresses to wind turbines and fishing gear</li> <li>• Set a proportion of drinks containers to be sold in refillable containers</li> <li>• Promote repair by introducing a reparability index</li> <li>• Provide funding and ongoing support for local reuse and repair operations</li> <li>• Standardise and improve recycling services for citizens</li> <li>• Ban the burning of plastic waste and phase out Scottish incinerators</li> <li>• Scale down environmentally harmful sectors including plastics production and chemical manufacturing (working particularly with producers at Grangemouth on this), mass-produced meat and dairy production in a just way</li> <li>• Explore and implement opportunities for processing waste transition metals, such as lithium, in Scotland</li> <li>• Bans (and where appropriate) charges on environmentally harmful products, from consumer products like single use vapes and artificial grass, to industrial chemicals such as Sulphur Hexafluoride (SF6) for which less harmful alternatives exist</li> <li>• Expanding the Single Use Plastic ban as widely as possible</li> <li>• Free and extensive network of water fountains</li> </ul>
Creating low carbon alternatives in Scotland	<ul style="list-style-type: none"> <li>• Ensure decarbonisation plans for Scotland’s energy, transport and agricultural sectors measure and reduce material demand as well</li> <li>• Improve and extend public services for economic sectors and activities with high resource use: healthcare, education, housing, transport, internet</li> <li>• Develop and invest in greener, more local recycling of Scottish scrap steel by guiding the development of an Electric Arc Furnace and the wider wind turbine supply chain, domestically</li> <li>• Introduce a publicly owned energy company that can stipulate circular economy strategies for energy generation, as well as driving supply chain justice</li> <li>• Direct the Scottish National Investment Bank to support companies with low impact material supply chains and fair working conditions</li> <li>• Create jobs and skills pathways, developed with workers and communities, to support people moving from carbon intensive jobs and fill knowledge gaps for new sectors</li> </ul>
Supporting fairer and more sustainable global supply chains	<ul style="list-style-type: none"> <li>• Create a resource justice strategy for Scotland which minimises the environmental and social global impacts of Scotland’s material demands</li> <li>• Develop due diligence guidance and circularity targets which applies to all executive agencies and Non-Departmental Public Bodies and encourage other businesses and services to do the same</li> <li>• Develop guidance for scope 3 emissions reporting for all businesses operating in Scotland, including the financial sector</li> <li>• All of the Scottish Government’s Just Transition plans should embed circular economy principles throughout their plans</li> <li>• Support the creation of a global just transition by calling on the UK Government to develop due diligence legislation and cancel unfair and unpayable debts</li> <li>• Circularity conditions on companies in receipt of public funds</li> </ul>