**Scotland’s Circular Economy and Waste – A Route Map to 2030**

**Respondent Information Form**

**Please Note** this form **must** be completed and returned with your response to

Circular Economy Division
3H South
Victoria Quay
Edinburgh
EH6 6QQ

Or

ceroutemap@gov.scot

To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

[ ]  Individual

[x]  Organisation

Full name or organisation’s name

Friends of the Earth Scotland

0131 243 2700

Phone number

Address

EH2 2PR

Thorn House, 5 Rose Street Edinburgh

Postcode

kpratt@foe.scot

Email Address

**Information for organisations:**

The option 'Publish response only (without name)’ is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

The Scottish Government would like your

permission to publish your consultation

response. Please indicate your publishing

preference:

[x]  Publish response with name

[ ]  Publish response only (without name)

[ ]  Do not publish response

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?

[x]  Yes

[ ]  No

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

[x]  confirm

**Friends of the Earth Scotland Response to the Scottish Government’s Circular Economy and Waste Route Map to 2030 Consultation**

March 2024

**About us**

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We are Scotland’s leading environmental campaigning organisation; an independent Scottish charity with a network of thousands of supporters and active local groups across Scotland. We are also part of the largest grassroots environmental network in the world, uniting over 2 million supporters, 75 national member groups, and some 5,000 local activist groups.

**Introductory comments**
We welcome the opportunity to respond to the Scottish Government's consultation on the Circular Economy and Waste Route Map to 2030.

Scotland urgently needs to transform the way we consume and manage resources. It is a matter of global justice and essential to the lives and welfare of ​current​ and future generations both in Scotland and overseas. To do this, Scotland must create a ​​circular economy, where material consumption is reduced to sustainable levels, by 2045.

The Scottish Government’s leadership is critical to success. Whilst the stated ambition in this consultation is welcomed, the measures described are insufficient to deliver the systemic changes needed ​to​ our entire economy. **Indeed, the failure to properly address issues which will have widespread impacts on the health and wellbeing of everyone in Scotland,1 and the employment of many thousands, is a failure of the Scottish Government in its duty to protect its citizens from harm.**

The lack of progress to improve waste management service in Scotland over the last decade is **evidence that the current approach has not worked**. The people of Scotland, people around the world involved in the supply​ of​ the materials for the Scottish economy and our global environment are unfairly paying the price for this failure. The Scottish Government must learn from these mistakes.

**Detailed comments**

Friends of the Earth Scotland is deeply concerned that our calls, and those of others across civil society, for a more ambitious Route Map and the urgent need for action were not heeded in the last Route Map consultation on 18 months ago. We call on the Scottish Government to make the following changes in its Route Map:

**Overall vision**

* Explain what it’s vision of a ‘fully circular economy’ means. What level of material use does the Scottish Government consider sustainable, in quantifiable terms?
* Give deeper thought to their plans for a just transition. What jobs in the linear economy do the Scottish Government expect to change? How will the Scottish Government collaborate with workers and trade unions to support people affected by these changes? What jobs and skills gaps do the Scottish Government anticipate will need to be filled in the creation of a circular economy?
* Commit to exploring how degrowth strategies2 can support a move to a circular economy.
* There is a lack of quantified evidence presented in the Route Map. i.e. how much waste reduction will this policy deliver? It is very difficult to assess the potential impact of policy choices made when there is no supporting evidence on its effectiveness.
* Circular Economy principles must be genuinely and completely embedded across all Scottish Government departments. Current efforts, such as in the Energy Strategy and Just Transition Plan, the National Planning Framework 4 and the National Strategy for Economic Transformation have been tokenistic.

**Product based measures**

* Be more transparent in its evidence-based process for prioritising activities. For example, what is the evidence for choosing textiles, mattresses and tyres as priority product categories for product stewardship?
* Include in the Route Map a prioritised action on how circular economy measures can be used to reduce toxic chemicals in products such as furniture, mattresses and plastic packaging.
* Expand plans for Extended Producer Responsibility schemes to cover many more product categories, including wind turbines, car batteries, fishing gear, artificial grass and toys.
* Strongly and clearly commit to a significant increase in support for reuse and repair services, which should be available to every person in Scotland.

**Incineration**

* There is a failure to build on the work of the independent review of incineration, included the accepted recommendations. For example, the indicative cap could have been included in this consultation.
* Commit to using its powers through the Pollution Prevention and Control (Scotland) Regulations to temporarily stop SEPA from granting permits to new incinerators until it has completed its Residual Waste Map and has the evidence needed to understand whether more capacity is justified.
* Expand its industry-led plans for decarbonising incineration to include other stakeholders, including communities and environmental groups.

**Transition minerals**

* Create a resource justice plan for transition minerals which ensures that the materials needed to transform Scotland’s energy and transport systems are obtained in a fair and sustainable way, using circular economy measures to reduce demand as much as possible.
* Develop a steel recycling plan for Scotland.
* Require all public sector bodies to introduce new due diligence guidance to reduce the social and environmental harm in supply chains that provide materials to Scotland.

Without large-scale, systemic changes to the approach set out in the Waste Route Map, as presented in this consultation, we believe that the Scottish Government will fail to create a path towards a circular economy, which is a vital part of a liveable future for Scotland. We urge the Scottish Government to consider these changes most seriously as a matter of urgent national importance.

We would also like to draw the Scottish Government’s attention to our more detailed response to the last Waste Route Map consultation, as many of the comments in it are still relevant. This can be accessed here: <https://foe.scot/wp-content/uploads/2022/08/Circular-Economy-Route-Map-consultation-FoES-response.pdf>

**Questionnaire**

**PART A**

**Question 1**

**To what extent do you agree with the priority actions proposed within the Reduce and reuse strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree or disagree

[x]  Disagree

[ ]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

The proposed actions are not ambitious, holistic or fast acting enough.

**Question 2**

**To what extent do you agree with the further actions to 2030 listed across the Reduce and reuse strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree or disagree

[x]  Disagree

[ ]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

The proposed actions are not ambitious, holistic or fast acting enough.

**Question 3.**

**To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree or disagree

[x]  Disagree

[ ]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

No consideration of steel recycling or transition minerals.

**Question 4.**

**To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree or disagree

[x]  Disagree

[ ]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

No consideration of steel recycling or transition minerals.

**Question 5.**

**To what extent do you agree with the priority actions proposed within the Decarbonise disposal strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree or disagree

[ ]  Disagree

[x]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

Failure to include accepted recommendations of the independent review on incineration.

**Question 6.**

**To what extent do you agree with the further actions to 2030 listed across the Decarbonise disposal strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[x]  Neither agree or disagree

[ ]  Disagree

[ ]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

We support the inclusion of EfW in the UK ETS but disagree with slow action on community engagement.

**Question 7.**

**To what extent do you agree with the priority actions proposed within the Strengthen the circular economy strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree or disagree

[ ]  Disagree

[x]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

More detailed targets and timelines are essential, particular around just transition and resource justice.

**Question 8.**

**To what extent do you agree with the further actions to 2030 listed across the Strengthen the circular economy strategic aim?**

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree or disagree

[ ]  Disagree

[x]  Strongly disagree

[ ]  Not answered

Please give reasons for your answer.

More detailed targets and timelines are essential, particular around just transition and resource justice.

**Questionnaire**

**PART B**

**Question 9.**

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

**Question 10.**

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

**Question 11.**

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

**Question 12.**

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

**Question 13.**

**What are your views on the accuracy and scope of the environmental baseline set out in the SEA Environmental Report?**

**Question 14.**

**What are your views on the predicted environmental effects of the draft Circular Economy and Waste Route Map as set out in the SEA Environmental Report?**

Please give details of any additional relevant sources

**Question 15.**

**What are your views regarding potential reasonable alternatives, in reference to the approach set out in the SEA Environmental Report?**

**Question 16.**

**What are your views on the approach to mitigation, enhancement and monitoring of the environmental effects set out in the SEA Environmental Report?**