

Tuesday 16th December 2025

Dear Gillian Martin MSP, Cabinet Secretary for Climate Action and Energy,

FAIR AND SUSTAINABLE SUPPLY CHAINS MUST BE CENTRAL TO SCOTLAND'S CIRCULAR ECONOMY STRATEGY

We, a group of civil society organisations and international groups, call on the Scottish Government to strengthen the Circular Economy Strategy for Scotland by encouraging responsible business practices so that Scotland's supply chains are fair and sustainable.

Demand for resources and products in wealthier countries, including Scotland, is causing serious and extensive social and environmental damage across the world. Governments in these wealthier nations have great responsibility and capacity to act. Failure to hold the corporate powers driving this system to account is a risk to humanity's chance for a better future.

A circular economy strategy which embeds fair and sustainable material use can be Scotland's first step towards this better future. People in Scotland want to see change. [Four in five UK adults support new laws to tackle environmental harm and human rights abuses in company supply chains.](#)

The circular economy strategy must align with the requirements of the 2024 Circular Economy (Scotland) Act, including having regard to:

- Reducing the material and carbon impacts of goods, products and materials,
- Managing waste in Scotland if appropriate to do so,
- Human rights and environmental due diligence of supply chains, and
- The potential international impacts of circular economy policies.

However, the draft strategy falls far short of these aims. It does not include a commitment to reducing consumption of materials. Human rights and environmental due diligence are only mentioned once in relation to the UK Government action and the potential international impacts of priority policies, such as those around critical raw materials, are not considered.

The final version of the circular economy strategy must include:

- A vision and outcomes where Scotland's material consumption and associated social and environmental impacts are reduced (Q2 and Q3).

- A commitment to deploying human rights and environmental due diligence measures within devolved powers, including due diligence guidance for businesses, due diligence standards for the public sector and enforcement of waste export rules (Q4). We welcome the commitment to work with the UK Government and urge the Scottish Government to encourage the UK legislation to be strengthened so that human rights and environmental due diligence is made mandatory.
- Consideration of the international impacts of priority areas, including the role of critical raw materials and textiles (Q8).
- A new priority area is needed on plastic which accounts for the international impacts and supply chain concerns around plastic products (Q8).
- The indicators should include raw material consumption and carbon footprint for Scotland (Q10).

This letter will be submitted as a joint response to the consultation on the Circular Economy Strategy for Scotland. The organisations below may also send individual responses.

Yours faithfully,

Friends of the Earth Scotland

THIRST – The International Roundtable for Sustainable Tea

Scottish Fair Trade

Friends of the Earth (England, Wales & Northern Ireland)

Water Witness International

Corporate Justice Coalition

ABColumbia

Fairtrade Foundation

SCIAF

Commonweal

GLOBAL 2000 – Friends of the Earth Austria

Environmental Association Za Zemiata – Friends of the Earth Bulgaria

Institute for Circular Economy (Bulgaria)

Scotland's International Development Alliance

Environmental Rights Centre for Scotland (ERCS)

London Mining Network

Labour Behind the Label

Sahabat Alam Malaysia (Friends of the Earth Malaysia)

Friends of the Earth Europe

Centar za životnu sredinu/Center for Environment (FoE BiH)

Centre for Financial Accountability

Quakers in Scotland