

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

PUT PEOPLE AND NATURE BEFORE PROFIT IN CIRCULAR ECONOMY STRATEGY

We, a group of civil society organisations and individuals, call on the Scottish Government to put people and nature before profit in the Circular Economy Strategy for Scotland. The strategy should be an opportunity to create a better future for everyone, but we are concerned that the draft version is not nearly strong enough to meet this vision.

The way resources and products are used in Scotland is contributing to pollution and climate breakdown. The Scottish Government's own data shows that Scotland's material footprint is more than double sustainable limits and increasing and over 80% of our carbon footprint relates to consumption. We live in a throwaway society where single use and poor-quality products are driving up costs for consumers, as well as being harmful to the environment.

Scotland is missing out on the benefits that a truly circular economy can bring. Preventing 10,000 tonnes of waste bound for incineration leads to the creation of 386 jobs in circular businesses at the loss of just one incineration job. High carbon activities, and the jobs associated with them, are often offshored rather than investing in green solutions at home. We export all our scrap steel for recycling but a modern steel recycling plant in Scotland could create 650 jobs and add £400m to our economy.

The people of Scotland deserve better; a society where the things we buy cost less because they last for longer. Single-use products are replaced with reusable options, and there is less rubbish, litter and pollution. People and natural resources in Scotland's supply chains should be protected from harm.

The circular economy strategy must align with the requirements of the Circular Economy (Scotland) Act, including reducing the material and carbon impacts of products, adhering to the waste hierarchy and human rights and environmental due diligence of supply chains.

However, the draft strategy falls critically short of these aims. It does not include a commitment to reducing consumption of materials. Reuse and repair are not prioritised. It fails to hold corporations to account for their harmful practices. And, despite evidence that plastic production will double by 2040, it does not mention plastics even once.

The final version of the circular economy strategy must include:

- A vision and outcomes where material consumption and associated social and environmental impacts are reduced (Q2 and Q3).
- A solution grounded in system change, which could support future behaviour change efforts (Q5). It is unfair and ineffective to ask people to change when it is the system itself which is broken. Investment in reuse should be a priority policy mechanism.
- New priority areas are needed on plastic, chemicals and electrical products (Q7). These materials demand special consideration in the strategy because of the scale of harm associated with their use.
- Replacing product stewardship plans with an ambitious extended producer responsibility programme (Q9) as there is evidence that EPR is more effective at incentivising producers to reduce waste and redesign products.
- Indicators for raw material consumption and carbon footprint for Scotland (Q10). The production, use and disposal of plastic must also be measured.

Please treat this letter as a joint response to the consultation on the Circular Economy Strategy for Scotland. The organisations below may also send individual responses.

Yours faithfully,

1. Friends of the Earth Scotland
2. United Kingdom Without Incineration Network (UKWIN)
3. Action to Protect Rural Scotland (APRS)
4. Stop Climate Chaos Scotland
5. Circular Communities Scotland
6. Edinburgh & Lothians Regional Equality Council (ELREC)
7. Nourish Scotland
8. HappyPorch, Barry O'Kane

9. Laura Anderson (Less Waste Laura)
10. Reloop
11. Common Weal
12. Everyday Plastic
13. Keep Scotland Beautiful
14. Fidra
15. Surfers Against Sewage
16. Plastic-Free Dalgety Bay
17. Plastic Free Helensburgh
18. Plastic-Free Scotland Communities
19. Wellbeing Economy Alliance Scotland (WEAll Scotland)
20. Environmental Investigation Agency (EIA)
21. 'Tabby, Make Scotland Plastic Free'
22. SCIAF
23. Whale and Dolphin Conservation (WDC)
24. Scottish Laity Network (SLN)
25. Marine Conservation Society
26. Environmental Rights Centre for Scotland
27. Quakers in Scotland
28. Friends of the Earth Tayside

29. Charity Retail Association

30. ScotLINK