

## Response ID ANON-B2C4-3ZNY-Y

Submitted to Circular Economy (Scotland) Bill  
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### About you

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I would like my response to be published in its entirety / Bu mhath leam gun deigheadh mo fhreagairt fhoillseachadh gu h-iomlan

3 What is your name?

Name / Ainm:  
Quakers in Scotland

4 What is your email address?

Email / Post-d :  
sarahk@quaker.org.uk

5 Are you responding as an individual or on behalf of an organisation?

Organisation / Buidheann

### Circular economy strategy

1 Is a statutory requirement needed for a circular economy strategy?

Please provide your response in the box provided.:

Yes, as Quakers we believe that economic systems profoundly affect culture and that bold government intervention is needed to transition to a regenerative economy. Our wish to engage with policy-making on this issue is driven by three of our core principles: simplicity, equality and sustainability. It is not only right, but now urgently vital, that we start to live within the limits of the planet's life system and in a way that provides for all. We need statutory measures because guidance/advice alone is not adequate when the planet is already reaching tipping points on liveability.

We believe that humans "do not own the world and its riches are not ours to dispose of at will" (Quaker Advices & Queries 42). We all have responsibilities for all that we have taken from the Earth. In the face of overwhelming evidence of rapidly increasing destruction of the Earth we are called to work for a world that prioritises ecological repair and wellbeing. We can all make a contribution but without significant, committed government intervention it will never be enough.

2 Is there anything else you would like to say about a circular economy strategy? (Section 1 – 5)

Please provide your response in the box provided.:

While the current economic system has provided many material benefits, those benefits have been unequally shared and many of them have been brought about through the over-exploitation of the Earth's natural resources. As Quakers we believe that until we create an economic system that values human wellbeing, fairness and sustainability above profits it will be very difficult to move beyond the existing linear and consumptive systems. While we appreciate that much of this broader consultation lies outwith the scope of the Circular Economy Bill, we would nonetheless encourage radical consideration of the function or purpose of the economy as it is our suggestion that the operation of the economy will largely reflect its function, or in-built priorities.

Reducing food waste is an important way in which a circular economy strategy can strengthen our food security in the face of supply shortages and high prices resulting from climate damage.

We believe that there needs to be a clear definition of a 'circular economy' included in a purpose clause to guide measures throughout the Bill, and measures taken under the Bill. For example, a clause could say "The purpose of this bill is to further a transition to an economy in Scotland that ensures as many products and materials as possible are dealt with as far up the waste hierarchy as is practical, while aiming to reduce our consumption of raw materials to sustainable levels and to phase out polluting and harmful materials and products".

3 How should circular economy strategies be aligned with climate change plans and other environmental targets (including biodiversity goals)?

Please provide your response in the box provided.:

We see the circular economy as being one critical building block which should fit in with climate change plans, other environmental targets, and the ongoing discussions surrounding the wellbeing economy. In this area we would also commend Kate Raworth's work on Doughnut Economics and particularly the key concept: human economies need to operate within the zone that enables human flourishing while not exceeding the planetary boundaries beyond which natural systems begin to collapse.

According to 2018 data, Scotland's carbon footprint was 13 tonnes per person per year, 22% higher than the UK average. Half of these emissions come from imports, which are not included in our current climate targets. These gaps can lead to negative economic effects, with high carbon activities, and the jobs associated with them, being offshored rather than leading to domestic investment in low-carbon solutions.

The circular economy strategy should be explicit in terms of how and when the measures will cut carbon emissions, taking into account both domestic and 'imported' emissions. Consideration should be given to the impact on the Energy Strategy in terms of the supply of materials for Scotland's energy transition.

## Circular economy targets

### 1 Are statutory circular economy targets needed?

Please provide your response in the box provided.:

Yes, binding targets are essential to ensure that the measures in this Bill have genuine impact, and don't just externalise Scotland's problems elsewhere. We note that the targets in the draft Bill appear to relate to reducing the overall consumption of materials, increasing reuse, increasing recycling and reducing waste, but would highlight that there should also be targets about consumption-based carbon emissions. The material footprint target allows a measure of the economy's overall circularity. The carbon footprint target ensures those materials which are required in smaller amounts but which are carbon intensive (such as critical materials like lithium and neodymium, which are required for the energy transition) are not overlooked.

### 2 Is there anything else you would like to say about powers to introduce circular economy targets? (Sections 6 and 7)

Please provide your response in the box provided.:

We would recommend the introduction of ambitious targets in line with ecological limits and climate science. Targets are required to set the pace and scale of change, and were supported by 86% of responders to the 2022 Circular Economy Bill Consultation. We note that the draft Bill provides that targets may be reviewed. We believe that it is a good idea to have interim targets which can then be increased in order to build capacity.

As part of SCCS, we believe that Scotland should adopt a greenhouse gas emissions-based target to reduce Scotland's carbon footprint to zero by 2045, with an interim target to reduce Scotland's carbon footprint by 75% by 2030 based on 1998 levels. Circular Economy targets should be specifically geared and described to show how they will contribute to this process. For example, Scotland should adopt a materials-based target to reduce Scotland's material consumption by 57% (to 8 tonnes per person) by 2045, with an interim target to reduce material consumption by 30% (to 13 tonnes per person) by 2030 based on 2017 levels. Ministers should be required to report to Parliament on progress towards carbon targets annually, as is already required for domestic carbon emissions under climate change legislation.

As well as targets for councils, there is a need to implement targets for producers, extending producer responsibility for the effects that their products have on the environment.

## Restrictions on the disposal of unsold consumer goods

### 1 Do you think there is a need for additional regulation restricting the disposal of unsold consumer goods?

Please provide your response in the box provided.:

Yes, we welcome further restrictions to reduce waste and incentivise companies producing fewer unnecessary goods. We believe that "a simple lifestyle freely chosen is a source of strength" (Quaker Advice & Queries 41). We need to consider the impact that our style of living is having on the global economy and environment.

### 2 Is there anything else you would like to say about the disposal of unsold consumer goods? (Section 8)

Please provide your response in the box provided.:

These measures should be kept under review in order to monitor their effectiveness. Ultimately, we may need greater regulation at the source of the issue: namely, that production, distribution, and delivery should be designed to reduce the consumption of materials overall. Otherwise, companies may continue to overproduce stock and then "donate" it to places such as charity shops or offshore where the goods may not be wanted or needed.

In addition to these proposals, which we understand are focused on the disposal of clothing and consumer electronics, there should also be a ban on supermarkets destroying unsold food, as implemented in France in 2016.

## Charges for single-use items

### 1 Should Scottish Ministers have powers to make regulations that require suppliers of goods to apply charges to single-use items?

Please provide your response in the box provided.:

Yes, we would support charges to incentivise reduction in single-use items. Any charges should be considered from an equalities perspective, and consideration given to charges being used to off-set the price of reusable alternatives. We would recommend consultation with impacted groups to ensure that there is not a disproportionate impact on those living in poverty.

2 Is there anything else you would like to say about charges for the supply of single-use items? (Section 9)

Please provide your response in the box provided.:

3 How do you think Scottish Ministers should use their powers to have the greatest impact in transitioning to a circular economy?

Please provide your response in the box provided.:

Beyond implementing charges for single use items, Scottish Ministers should also set a target date to ban all single use items where readily available alternatives exist. For products which are consumed in high volumes and/or which use a lot of resources, such as disposable coffee cups or vapes, earlier bans should be implemented.

## Household waste

1 Should it be a criminal offence for a householder to breach their duty of care in relation to waste under the Environmental Protection Act 1990 (e.g. to fail to ensure that waste is disposed of to an authorised person)?

Please provide your response in the box provided.:

2 Is there anything else you would like to say about household waste and enforcement of household waste requirements? (Sections 10 & 11)

Please provide your response in the box provided.:

We believe that there is a risk of disproportionately impacting marginalised groups and those already experiencing economic hardship. We would recommend prioritising an approach which enables everyone to participate fully in recycling schemes and provides accessible, affordable, and convenient options for recycling / waste disposal, rather than penalising individuals in cases where no accessible alternative exists.

3 Is further action needed, either within or outwith the Bill, to tackle flytipping effectively? If so, what action is needed?

Please provide your response in the box provided.:

## Household waste recycling – Code of Practice and local targets

1 Should the Code of Practice on household waste recycling (currently a voluntary code) be put on a statutory footing?

Please provide your response in the box provided.:

Yes, we would support the voluntary code being put on a statutory footing to strengthen motivational messaging, consistency and enforcement.

2 Is there anything else you would like to say about a Code of practice on household waste recycling? (Section 12)

Please provide your response in the box provided.:

We reiterate the importance of enabling and supporting household waste recycling with accessible, affordable, and convenient options, rather than solely penalising.

In addition to recycling targets, Scottish Ministers should set reuse targets in order to reverse the current system which incentivises recycling more than reuse investment and system change. Reuse should be prioritised over recycling, in line with the principles of the waste hierarchy. These reuse and preparation for reuse targets should be mandated at a Scottish level and reported alongside existing recycling targets for local authorities.

3 Should Scottish Ministers have powers to set targets for local authorities relating to household waste recycling?

Please provide your response in the box provided.:

Yes, binding local authority targets (for both reuse and recycling) are needed in order to assist Scotland in achieving its overall net zero ambitions.

4 Is there anything else you would like to say about targets for local authorities relating to household waste recycling? (Section 13)

Please provide your response in the box provided.:

5 Is further action needed, either within or outwith the Bill, to support local authorities to achieve higher household recycling rates? If so, what action is needed?

Please provide your response in the box provided.:

Once targets are set, Scotland needs a clear process to monitor and report actual progress against targets on a local authority and national level, and to act when progress is insufficient.

At a European level, work is progressing in France, Spain, and Belgium to implement reuse or preparing for reuse targets, and ambitious preparation for reuse targets are about to be implemented in Portugal. These examples demonstrate that such targets are feasible.

### Lifting from vehicles

1 Should civil penalties for littering from vehicles be introduced?

Please provide your response in the box provided.:

2 Is there anything else you would like to say about civil penalties for littering from vehicles? (Section 14)

Please provide your response in the box provided.:

### Enforcement powers in respect of certain environmental offences

1 Should enforcement authorities in Scotland be given powers to seize vehicles linked to waste crime?

Please provide your response in the box provided.:

2 Is there anything else you would like to say about enforcement powers? (Sections 15 and 16)

enforcement anything else:

### Reporting on waste and surpluses

1 Should Scottish Ministers have powers to require persons to publish information on anything they store or dispose of (except in relation to domestic activities)?

publish info on anything public store or dispose of:

Yes, we would support transparency measures to hold producers accountable and provide data to inform policy. There needs to be transparency across supply chains to tackle waste and enable circular systems.

2 Is there anything else you would like to say on reporting? (Section 17)

Please provide your response in the box provided.:

3 How should Scottish Ministers go about identifying which types of waste and surpluses should be subject to mandatory public reporting?

identifying waste and surplus for mand reporting:

We would recommend a collaborative approach involving stakeholders and those involved to determine reporting priorities and methods.

### Net zero

1 Do you think the Bill will play a significant role in achieving these net zero targets? Please give your reasons.

Please provide your response in the box provided.:

We support the Bill and believe that the implementation of a Circular Economy could be significant in making progress towards net zero targets if it is sufficiently strong and clear in its commitment. However, we believe that as drafted, the Bill needs more ambition on production, consumption, and systems-level transformation to fully enable the transition required. In particular, it needs to demonstrate the need for and benefits of reduced demand/consumption. Over-consumption and resulting waste are part of our carbon footprint. But circular economy measures, though they have a part to play, are no replacement for large-scale cuts in fossil-fuel burning.

2 There is a Policy Memorandum accompanying the Bill. This aims to set out the underlying reasons why the Scottish Government thinks the Bill is necessary. Did you find the discussion under "Sustainable Development" in the Policy Memorandum helpful or unhelpful in terms of understanding what impact the Bill would have in terms of reaching these net zero targets?

Please provide your response in the box provided.:

### General comments or aspects not in the Bill

1 Are there any areas not addressed by the Bill that you believe should be included? If so, what are they?

Please provide your response in the box provided.:

We feel that the Bill lacks ambition. In particular, there are no provisions specifically relating to the construction and agricultural sectors.

Alongside this Bill, as discussed above we believe there needs to be broader economic reform in moving to a 'wellbeing economy'.

In addition, there is no 'right to repair' as we have seen promoted in the European Union for example, which would result in savings for consumers, jobs for those involved in repairing, and less waste.

To reduce the burden on taxpayers and spur innovation in sustainable design, we urge extending producer responsibility to include, for instance, wind turbine blades, mattresses and textiles. Clarity and rigour are particularly important for batteries, to overcome people's legitimate concerns about this as we move to more electricity consumption. Having companies manage products' entire lifecycles embeds the "polluter pays" principle and redirects substantial private funding for environmental solutions. Well-structured schemes here would demonstrate Scotland's leadership.

The Scottish Ministers should bring forward extended producer responsibility schemes which are mindful of the waste hierarchy. This means prioritising local reuse and repair over large recycling schemes (particularly where these involve overseas processing). Supporting grassroots circular projects, not export, is key to public confidence and community benefit. With care, extended responsibility can create local jobs and empower enterprises delivering transformative change, including local charities and social enterprises.

2 Are there international examples of best practice in legislation supporting the transition to a circular economy?

Please provide your response in the box provided.:

In France, a Repairability Index was recently introduced which shows how consumers can be educated on repair and producers encouraged to make their products more repairable.

## Resource and Waste Common Framework

1 Do you have comments on how this wider framework should function to support Scotland's transition to a circular economy, in particular on the provisional Resources and Waste Common Framework?

Please provide your response in the box provided.: