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<b>Report To</b>	<b>Environment and Regeneration Committee</b>	<b>Date</b>	<b>30/08/12</b>
<b>Report By</b>	<b>Corporate Director Environment, Regeneration &amp; Resources</b>	<b>Report No</b>	<b>SSC/ENV/IM/12.130</b>
<b>Contact Officer</b>	<b>Kenny Lang</b>	<b>Contact No</b>	<b>5906</b>
<b>Subject</b>	<b>Scottish Government Consultation – Safeguarding Scotland’s Resources</b>		

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## **1.0 PURPOSE**

- 1.1 The purpose of this report is to advise the Committee of the Scottish Government Consultation on Safeguarding Scotland’s Resources – A Programme For the Efficient Use of Our Materials.

## **2.0 SUMMARY**

- 2.1 The Zero Waste Plan, published on 9 June 2010, set out the strategic direction for waste policy for Scotland and proposed a number of actions to be taken to deliver it. One of the strategic directions was to move to waste prevention and maximising resource efficiency.
- 2.2 The Scottish Government published the waste prevention programme consultation (now called Safeguarding Scotland’s Resources) on 27<sup>th</sup> June 2012. Much of the consultation is geared towards front end resource management, such as minimising waste prior to it reaching the consumer.
- 2.3 This consultation sets out a range of 5 key measures to promote efficient use of material resources, including reducing waste, products and packaging and resource efficiency. Through the consultation the Scottish Government are proposing targets, for an initial 5% reduction in total waste by 2015, with a longer term aim for a 15% reduction by 2025.
- 2.4 The consultation poses 15 main questions and a draft response has been prepared on behalf of Inverclyde Council (Appendix 1).

## **3.0 RECOMMENDATIONS**

- 3.1 It is recommended that the Committee note the contents of this report and feed back any comments to officers.
- 3.2 That it be remitted to the Head of Environmental and Commercial Services to respond to the Scottish Government by consultation deadline of 28<sup>th</sup> September 2012.

Ian Moffat  
Head of Environmental and Commercial Services

## 4.0 BACKGROUND

- 4.1 In response to the European Waste Framework Directive, Scotland developed the Zero Waste Plan published in June 2010, the Plan sets out the Scottish Government's vision for waste.
- 4.2 The plan identified a number of key measures among them the development of a waste prevention programme which would prioritise the efficient use of materials, avoiding waste and reusing items.
- 4.3 In order to develop these strategies, the Scottish Government has issued a consultation document (Safeguarding Scotland's Resources) on 27<sup>th</sup> June 2012. The consultation seeks views on a number of high level proposals which aim to progress the Scottish Government's vision for waste in the broad areas of working with businesses; product design and packaging; reuse; and influencing behaviours.
- 4.4 The consultation period ends on 28th September 2012.

## 5.0 CONSULATION DOCUMENT

- 5.1 The consultation document has a headline target of an overall 5% reduction in all waste by 2015; and a longer term vision of a 15% reduction in all waste by 2025. This is coupled with ambitious recycling targets, in line with the vision for a low-carbon, sustainable future for Scotland.

In order to achieve these targets the Scottish Government have identified a number of key elements such as:

- Measures to support business and public bodies to save on waste and materials, including delivering a single business resource efficiency service for Scotland.
- Improving the way producer responsibility measures for packaging operate to capture more for recycling in Scotland.
- Introducing Zero Waste Pledges, encouraging businesses to commit to waste reductions and take the credit for their actions.
- The consultation also puts forward proposals for requiring retailers to charge for single use carrier bags, with the proceeds going to good causes. This is about encouraging us all to reuse bags.

- 5.2 Supporting these key elements are a number of actions across specific areas as follows.

### **BUSINESS RESOURCE EFFICIENCY**

**Action 1 - Simplifying access to business resource efficiency advice:** Developing a new single service - replacing business and public sector resource and energy efficiency advice and support currently delivered through Carbon Trust, Energy Saving Trust and Zero Waste Scotland. The new service will help identify and implement waste, energy, and carbon efficiency measures designed to cut costs and improve competitiveness.

**Action 2 - Voluntary agreements with business:** Working to ensure that voluntary agreements with business on waste and resources work well in Scotland and include a waste prevention focus.

**Action 3 - Zero Waste Pledges:** Enabling proactive companies to gain recognition through public commitment to a new Zero Waste Pledge system.

**Action 4 - Preventing construction wastes:** Encouraging prevention, reuse and recycling of construction wastes through promoting Site Waste Management Plans and the Halving Waste to Landfill commitment. Working with the industry to develop these into more comprehensive tools will unlock greater benefits through efficient use of construction materials.

**Action 5 - Data, benchmarks and tools:** Working to develop data and tools to help businesses make more efficient use of resources.

**Action 6 - Waste management industry:** Exploring the potential for a voluntary agreement with the industry to help their customers reduce waste and recycle more.

## **PRODUCTS AND PACKAGING**

**Action 7 - Sustainable design:** Promoting sustainable design of products and services through ensuring we have the right further and higher education; providing guidance and training from the businesses advice service; and supporting the work of the Product Sustainability Forum to identify key areas to improve product design.

**Action 8 - Producer responsibility for packaging waste:** Working to amend existing Producer Responsibility regulations to enable separate identification of packaging waste arising in Scotland; to use as a baseline for future Producer Responsibility targets for packaging waste in Scotland.

## **REUSE**

**Action 9 - Reuse supply and demand:** Working to increase the supply and demand for quality reusable items through improving collection, promotion and public procurement.

## **INFLUENCING BEHAVIOURS**

**Action 10 - Carrier bags:** Reducing the number of carrier bags used in Scotland by legislating to require retailers to charge for bags; with a voluntary agreement that net proceeds will be donated to good causes, including for waste and litter prevention. The Scottish Government expect to see bag use fall by at least 60% in Scotland. If 80% is achieved, the charge would raise around £5m per year for charitable good causes.

**Action 11 - Community action:** Promoting community activity to prevent waste through supporting practical actions including funding community-led waste prevention through the Climate Challenge Fund.

**Action 12 - Waste collection systems:** Helping local waste collection services to minimise the waste produced by Scottish households through guidance and developing a business case for reusing bulky waste.

**Action 13 - Public bodies' leadership:** Rolling out sustainable procurement training and best practice guidance across the public sector.

5.3 The consultation document seeks to elicit responses and opinions to a number of questions and a draft response has been prepared (Appendix 1). A number of questions

are sector specific and are not applicable to the Council to respond to.

- 5.4 As a consultation document it lacks the depth and detail in a number of areas to provide robust responses to some of the questions.

Scotland is a net importer of goods and has a declining manufacturing base, furthermore the majority of materials collected for recycling by Local Authorities and waste processors are traded on the global market with the majority of the material being exported overseas.

A significant level of investment in Scottish Markets is required to ensure the Scottish Government are to achieve their desired outcomes of retaining the economic value of materials in Scotland. This includes reprocessing facilities and manufacturing derived from recycled materials. The Scottish Government acknowledge this gap but do not identify measures within the consultation to tackle it.

- 5.5 A further issue is that the majority of packaging waste (cardboard, plastic etc) is exactly the type of material which is easily recycled, a reduction in this material may impact recycling performances and this again is not addressed sufficiently within the consultation.

## **6.0 IMPLICATIONS FOR INVERCLYDE COUNCIL**

- 6.1 There are very minimal implications for Inverclyde Council that have not already been highlighted under The Waste (Scotland Regulations) 2012.

- 6.2 The bulk of the waste minimisation policy and subsequent consultation focuses on product design, manufacturing, retail and commercial businesses, rather than collection treatment and disposal.

## **Appendix 1 - SUMMARY OF QUESTIONS AND RESPONSE**

### **Overview**

While the consultation is welcome, and we agree with the policy of minimising waste prior to it reaching the end consumer, there is insufficient depth or detail behind some of the proposals to allow a robust response.

Scotland on the whole is a net importer of products and a net exporter of material for recycling. A significant level of investment in Scottish Markets is required to ensure the Scottish Government are to achieve their desired outcomes of retaining the economic value of materials in Scotland. This includes reprocessing facilities and manufacturing derived from recycled materials. Many of the markets are still in their infancy and where there are established markets they may find it difficult to compete with the demand as the Scottish Government are putting more and more emphasis on the amount of material Scotland has to be recycling in the future.

Scotland does operate with globally traded commodities though at a relatively low tonnage. As a result material can be exported many thousands of miles to reach an area of demand. When looking at reducing carbon emissions and tools such as the carbon metric, how do we quantify this? Do we look at the full life cycle of the product/commodity, including the carbon costs of exporting material or does the end of life come once it has been collected from the kerbside.

There is a significant emphasis on recycling and some major investment has been made in terms of infrastructure and support services. The behavioural change in terms of recycling activity has been largely successful; however, there is a dichotomy in that the current high levels of recycling across Scottish Authorities are tonnage based. Much of this comes from the types of materials which, if the minimisation policy is successful, will reduce significantly. This impacts on recycling performance and needs to be addressed.

There needs to be a clearer link between the emerging policies to ensure that they work together and are not merely individual but related policies with no coherence at its heart.

**Business Resource Efficiency** - We are interested in receiving feedback on our business resource efficiency proposals and the priorities to help businesses in Scotland benefit from more efficient use of materials. We also want to hear from companies interested in finding out more about specific proposals or assisting with their development.

A. We have already decided to go ahead with the integrated Business Resource Efficiency service and are engaging directly with stakeholders over how it should be focused. We would however welcome views on the priorities for the new integrated service. (Action 1)

### **Response**

As the Scottish Government has already decided to proceed with an integrated Business Resource Efficiency service prior to all the responses being submitted, what is the rationale for this and is this purely a cost cutting measure?

A “one stop” shop approach would be beneficial however there must be a consistency of approach through all areas of the new entity charged with covering the activities of Carbon Trust, Energy Saving Trust and Zero Waste Scotland, without diluting or minimising the impact of each area.

Initially any priority when merging agencies would be to identify areas of duplication or cross working and remove these where possible. Streamlining access to information, advice, contacts and support would also be beneficial ensuring that companies are not faced with dealing with numerous agencies and occasionally conflicting information.

There are a number of performance related targets set by the Scottish Government that will require advice, training and funding being distributed to SME's and larger organisations. Will the new Business Resource Efficiency service look at such performance tools as the carbon metric and future waste management infrastructure such as waste to energy, Anaerobic Digestion etc. How will the Scottish Government ensure this is effectively and efficiently managed and funded?

A priority area would be to agree a common approach through the existing agencies to the measurement of Carbon Metric ensuring that both the data requirements and advice is suitably robust and integrated across each sector.

B. We would welcome views on the type of "Zero Waste Pledge" companies might be interested in signing up to and the type of support needed. (Action 3)

### **Response**

The "Zero Waste Pledge", should encompass the overarching resource efficiency vision which the Scottish Government have set out as part of this consultation.

Therefore waste in its wider context should be considered (i.e. wasting energy, water physical resources and so forth).

Accordingly areas such as reducing energy water and physical waste, using alternative sources of energy, reusing materials should form part of the commitment.

Again this should be backed up by a robust support and methodology to identify carbon savings clearly linked to any financial benefits. Companies could be demonstrated as having achieved tangible benefits.

Who will be responsible for monitoring these pledges? This relates back to the previous question on the Business Resource Efficient service. Would they be responsible, would it be passed to an external agency or would it be simply a self assessment model? A more detailed methodology is required before a full response could be submitted.

C. For companies and organisations involved in the construction sector, do you agree with the principle of a new voluntary agreement, following on from "Halving Waste to Landfill", encompassing the impact of design on both construction waste and materials? We would also welcome views on the level of ambition for such an agreement. (Action 4)

### **Response**

This seems very similar to the Waste Aware Construction Programme developed by Waste Aware Scotland and subsequently adopted by Zero Waste Scotland under their Construction programme. Would this not be seen as a duplication of work?

D. For companies with existing "Resource Utilisation Assessments" (Action 5), we want to hear any lessons or good practice points to help us make sure future guidance on RUAs is as useful as possible in enabling relevant businesses realise resource savings?

N/A for a Local Authority response.

E. For waste management companies, would you be interested in signing up to a voluntary agreement to provide resource efficiency advice to your customers? (Action 6)

### **Response**

Commitment to a voluntary agreement should also be applicable to Council's, as a major collector of commercial waste. Advice on reducing waste is often provided by Local Authorities to businesses which it collects from. Again there could be scope for integrating advice, and ensuring a consistency approach across the public and private sector. This could be an approach led by the Scottish Government and Zero Waste Scotland similar to the best practice guidance on MRF efficiency etc.

Caution should be applied however as it could pave the way for more complicated procurement process. Waste management companies would not be willing to provide guidance and advice on their specific treatment/disposal methods for a customer to go to their existing contractor to integrate a similar method.

F. For other companies, what more would you want to see in terms of advice on resource savings and recycling from your waste management contractor? (Action 6)

### **Response**

Similar to the point above, (E), this should be driven centrally by either the SG or ZWS to ensure there is a continuity of advice and good practice being delivered by waste management companies but also allowing customers the freedom to 'shop around' for the best price. If this type of advice was delivered direct by individual waste management companies it would be tailored to their specific preferred methods rather than the best method for that individual customer.

**Products and packaging** - We are interested in receiving feedback on the proposals designed to encourage more efficient use of material resources in providing the products and packaging we need.

G. Do you agree with the actions identified to support sustainable design of products? (Action 7)

### **Response**

Partially Agree.

While the raft of measures identified would promote the sustainable design of products from a Scottish Manufacturing perspective, the majority of commodities and goods purchased in Scotland are designed and manufactured out-with Scotland.

The level of manufacturing within Scotland is not considered to be so significant that the actions identified to support sustainable design would make such a material impact and certainly it is unlikely that this alone will contribute greatly to the waste reduction targets of 5% by 2015; and a 15% reduction in all waste by 2025.

It is more likely that some balance between front end design and consumer choice will be required to effect long term changes in this area.

Identifying comparative cost of packaging between products may help consumers to decide which products they will purchase and lead manufacturers to design out waste.

In all likelihood however, it is more likely that manufacturers will take a lead role in this in order to minimise costs particularly in the current economic climate. The proposals to identify and create new opportunities for manufacturing arising from re-use and recycling will also benefit these aims.

There is no point setting up new training, support and guidance if the products are not there to be processed.

H. Do you agree with the principle of amending the existing Producer Responsibility Regulations to enable separate identification of packaging waste arising in Scotland; to use as a baseline for subsequent separate Producer Responsibility targets for packaging waste in Scotland (Action 8)?

### **Response**

Agree.

This could also be linked to identifying the costs of packaging which would assist manufacturers and consumers alike.

As a Local Authority we are at the far end of the supply chain in regard to the collection of the packaging waste. Any method that reduces the unnecessary packaging would be welcomed.

With this in mind however the Scottish Government may need to look at the overall method of calculating recycling performance. If the net recycling tonnage decreases, through improved packaging methods, but the net residual tonnage remains constant, recycling performance will drop.

H-1: Do you agree with the approach regarding retailers? Please give reasons.

### **Response**

Large retailers already do a large amount of recycling through schemes such as backhauling etc. What advantage will this generate and what would be the incentive for retailers to do so?

H-2: Do you agree with the approach regarding the retail supply chain?

### **Response**

Regardless of who is closest to the point where the packaging becomes waste the SG or ZWS need to improve and increase the number of reprocessors in Scotland to deal with this type of waste.

H-3: Do you agree with the proposal that those in the pre-retail supply chain should be permitted to use a set allocation of their total output as 'Scottish' waste?

### **Response**

Does this not already exist? If the waste is disposed of or treated within Scotland then is this not already recorded through SEPA. Or could this not be achieved more readily through the merchant facilities via the Waste Transfer Note System?

H-4: If the supply chain businesses chose to provide evidence of the exact amount of their product ends up as waste in Scotland, what evidence should be accepted?



## **Response**

A system similar to the existing Transfer Notes, weighbridge tickets etc.

H-5: Should a distinction be made between the different stages of the supply chain?

## **Response**

This relates back to a previous quote in the document that Scotland is a net importer of goods/supplies. For a producer in Africa (for example) to determine the amount of their packaging treated as waste in Scotland would be very difficult, especially with the large number of distribution companies operating within the UK.

H-6: Do you agree with the approach regarding importers? Please give reasons.

## **Response**

Partially agree. However a system already exists through SEPA/WDF. Could this not be amended to suit?

H-7: Do you agree with the approach regarding reprocessors and waste exporters? Please give reasons.

## **Response**

If it is going to be made a voluntary approach then I do not believe companies would go to the extra cost and effort to separate the location of material.

H-8: We would welcome further views on the proposed approach to prevent fraud and double counting.

## **Response**

A system of self auditing and comparison across sectors may be beneficial, it is important however that this is operated within the spirit of the policy and does not become a bureaucratic monitoring and inspection regime.

I. For those involved in the sale of electronic and electrical equipment or collection of WEEE, we would welcome views or good examples of the most effective approaches to making it easier for people to return more of this type of equipment for recycling and reuse.

## **Response**

As a Local Authority and a collector of WEEE, similar to 'H' we are at the end of the supply chain when the product has come to its end of life.

Local Authorities are already stretched in terms of collections as it is, any further collections would need to be heavily subsidised or carried out by a third party.

Take back schemes and community reuse schemes will have a larger role to play in the collection of WEEE in the future.

J. We would be interested in your views on priorities to increase the resilience of the Scottish economy to supply risks associated with critical materials, and for maximising the opportunities for Scottish businesses.

## **Response**

To keep the economic value of the materials in Scotland a lot will need to be done to increase, and improve, the markets in Scotland. Few markets exist in Scotland to cope with the demand of the tonnage generated of the material types.

**Reuse** - We are interested in receiving feedback on the proposals designed to encourage greater reuse of items.

K. Do you agree with the actions identified to increase the supply and demand for quality reusable items (Action 9)?

## **Response**

Agree. Reuse is at the top of the waste hierarchy, above recycling. The Scottish Government has been pushing recycling for a number of years and is still pushing the majority of funding towards recycling of the 'core' materials as identified in the Zero Waste Plan.

L. Do you feel it would be (a) practical and (b) valuable to collect separate data on the quantities of materials 'prepared for reuse' with a view to developing a preparing for reuse target contributing towards overall recycling targets?

## **Response**

a) From a Local Authority point of view there is already a method for capturing the quantity of material sent for reuse through WDF.

b) Collecting data on materials 'prepared for reuse' is a false target, as not all material 'prepared for reuse' will be reused and instead end up as recyclable or residual waste. The data should be looking at actual material collected for reuse and actually reused.

## **Influencing behaviours**

M. We are interested in receiving feedback on the proposals, including communications, designed to influence behaviours of individuals and organisations to use material resources more efficiently:

## **Response**

Householders may find it difficult to make the distinction between resource efficiency and recycling. The processes have to be in place for the wider public to participate and understand. I agree that a strong communications campaign has to be developed however this will have to be done in a nature that is acceptable to Scotland and Scottish Local Authorities, building on the excellent brand that has already been established here for over 7 years. Based on recent experience the brand ZWS are looking to go with is one more of a 'lifestyle shot' rather than material images combined with the WRAP (English) style of working.

If we change the current branding for a new campaign we would need to change the whole concept for all recycling / waste management campaigns which would be both costly and undo all the good work of the previous 7 years. The best scenario would be to develop a suite of materials that complement the existing brand.

N. Do you support the proposal of introducing a charge for carrier bags (Action 10)? In particular we would welcome views on the key aspects of the proposals:

- including all retailers
- including all single use / disposable carrier bags, regardless of material
- setting the minimum charge at 5p
- the exemptions proposed in Annex 2
- making the scheme cost neutral for retailers
- directing net revenues to good causes - including your views on the types of good causes to be included
- design of the reporting system

Agree/Partially Agree/Disagree

## **Response**

Partially agree.

Scotland as a whole needs to be careful when it comes to a charge for carrier bags. Something needs to be done to reduce the number of bags consumed. Scotland would want to avoid a similar scenario as happened to Ireland when they introduced the tax. The amount of litter increased as a direct impact of people having fewer carrier bags in their homes to act as 'rubbish bags'.

How do you qualify 'single use'? There are a number of retailers who offer incentives for re-using carrier bags. These are technically being reused.

To make it a fair 'tax' this would need to be adopted (enforced) across all retailers. Consumers may be put off going to a certain shop if they have to pay for carrier bags when they can go to a competitor down the road and get bags for free. Would there be penalties would be in place for shops who do not charge for carrier bags?

As a Local Authority it would be good to see a proportion of the 'tax' raised invested in publicity/campaigns and good causes that would have a direct impact on the local environment. This could include clean up incentives, regeneration purposes etc.

## **Indicators and Monitoring**

O. We would welcome comments on these proposed targets and indicators, in particular views on the merits of an absolute target or one relative to GDP, given the strong relationship between economic growth and waste generation in previous years.

## **Response**

As a Local Authority any targets / indicators would need to be a long term arrangement with robust methodology to back them up. Going on the recent carbon metric issue, if that had been progressed Scottish Local Authorities would have had a different strategy for going forward as apposed to the current tonnage based performance.

Regardless of the targets set, Scottish Local Authorities will strive to meet these. The Scottish Government has a major role to play in keeping a consistent and constant approach and ensuring the method for reporting does not dramatically change every few years.

Local Authorities and merchant facilities have to plan and invest in collection and treatment/disposal services. If these are to change every few years there will be no confidence in the market and will have an overall detrimental effect. In turn this would go against everything this consultation document is trying to achieve.