Scottish Water Consultation Response
March 2024

Scotland's Circular Economy and Waste Route Map to 2030

<u>Overview</u>

General Comments
Scottish Water is supportive of the move to a fully Circular Economy by 2045. We have developed our circular economy approach to ensure we can deliver a sustainable service for our customers, now and in the future. While we welcome the publication of the Scottish Government's updated route map to 2030, we would encourage a longer-term position on ambitions and directions beyond recycling. Circular Economy thinking aligns strongly with Scotland's biodiversity, climate change mitigation and economic ambitions and this could be strengthened. Given that Scottish Water's activities are intrinsically linked to Circular Economy principles, we need to ensure that investment in our assets, particularly around biosolids recycling and resource recovery, are aligned with government ambitions.

<u>Detailed Response</u>

Specific Comments
The four aims should not be given equal priority and weighting, which is how it is currently designed. The route map should be linked to the Waste Hierarchy. The focus is very much on avoid, reuse/recycle and disposal. This is a missed opportunity to capture activities that support and enable resource recovery. We suggest a review of current waste combining and disposal legislation, reuse policy, end of waste quality measures and recycled material in products and packaging targets to ensure no unintended barriers to introducing these Circular Economy approaches.

	PART A – CONSULTATION QUESTIONS
1.	**To what extent do you agree with the priority actions proposed within the Reduce and reuse strategic aim?** **Please provide evidence to support your answer if possible.**
	[Strongly agree / <mark>Agree</mark> / Neither agree nor disagree / Disagree / Strongly disagree / Not answered] Scottish Water supports the Scottish Government's proposals to promote responsible consumption. We are supportive of proposals to introduce charges for environmentally damaging items and to develop a prioritised approach to charges and bans on other environmentally damaging products. These proposals could help reduce the impact these items have for example on our sewer network operations. Scottish Water would like to see water included as a product for responsible consumption.

Scottish Water supports the proposals to embed circular construction practices and introduce Scottish resource hubs which will reduce resource needs, waste and carbon and encourage refurbishment and reuse. We would also like to see machines and parts included in this and suggest an alternative construction materials library/database to be used by all businesses at design stage to reduce virgin product use in construction and grow the market for recycled materials.

2.	**To what extent do you agree with the further actions to 2030 listed across the Reduce and Reuse strategic aim?** **Please provide evidence to support your answer if possible**

[Strongly agree / <mark>Agree</mark> / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

We would welcome the introduction of requirements for public organisations to use consistent Circular Economy metrics across organisations, including reuse targets.

For food waste in rural areas, Scottish Water would welcome a review of Scottish Government policies which define recycling activities as only those which produce PAS100 or PAS110 materials and which, therefore, prevent non-PAS compliant material from being counted towards recycling targets. This is potentially limiting opportunities, particularly in rural areas where PAS suitable organic waste volumes might not support a viable treatment process or where existing facilities might not be maximising energy yields. Co-treatment with non-PAS100/110 material (e.g. wastewater bioresource) could deliver an output with a life-cycle environmental benefit that is equivalent to that from a 'high quality' output and make rural treatment more cost effective and reduce transport costs and carbon. Where evidence supports this, Government policy should be flexible enough to allow this material to be counted towards recycling targets

As a business that needs to regularly carry out excavation activities, we would support the proposals to incentivise recycled aggregates and find alternative uses for unavoidable soils and stones, including the reintroduction of the development of a soil symbiosis programme which was included in Package 5 of the route map to 2025.

3.	**To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim?** **Please provide evidence to support your answer if possible.**

[Strongly agree / Agree / <mark>Neither agree nor disagree</mark> / Disagree / Strongly disagree / Not answered]

Scottish Water would like to emphasise the importance of the clear labelling of products which is currently missing from the priorities. Product composition should state how it should be recycled or disposed of safely in a domestic or commercial setting.

This is particularly important for items such as wet wipes, sanitary products, nappies, plastic wrappers and tampons that are often inappropriately flushed down the toilet or otherwise end up in our network. Clear labelling for the disposal of unused or expired medicines, and a consistent approach to the return of medicines by NHS Scotland and pharmacies would help to reduce the significant risk of antimicrobial resistance and reduce the wider impact on the environment.

4.	**To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim?** **Please provide evidence to support your answer if possible.**

[Strongly agree / <mark>Agree</mark> / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Scottish Water supports business-business reuse platforms and would like to see a database of Scottish business assets and waste that can be used by other businesses to create products and facilitate the reuse of waste streams.

5.	**To what extent do you agree with the priority actions proposed within the Decarbonise disposal strategic aim?** **Please provide evidence to support your answer if possible.**

[Strongly agree / <mark>Agree</mark> / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

We welcome the introduction of a residual waste plan once all previous options for reuse and recycling have been exhausted.

Improving the data on carbon production for material to landfill and measuring it at a corporate level would promote action for businesses.

6.	**To what extent do you agree with the further actions to 2030 listed across the Decarbonise disposal strategic aim?** **Please provide evidence to support your answer if possible.**

[Strongly agree / <mark>Agree</mark> / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

We believe our responses to previous questions support the further actions listed.

Energy from waste in the route map should also include energy generated from biosolids (sludge). Scottish Water supports the inclusion of energy from waste in the ETS as well as other incentives.

We would also like to see differentiation between incineration and gasification/pyrolysis activities to avoid any unintended consequences or missed opportunities in incineration.

7.	**To what extent do you agree with the priority actions proposed within the Strengthen the circular economy strategic aim?** **Please provide evidence to support your answer if possible.**

[<mark>Strongly agree</mark> / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Scottish Water welcomes the refresh of the Circular Economy strategy every 5 years, with appropriate review periods established. This would be the best place to call out specific resources to prioritise recovery and support for markets.

We support the need for high-level Circular Economy targets that are outcome-led. These targets (or objective key results) would allow for consistent progress to be monitored from the current baseline and consider the context of each industry. We would welcome engagement on the creation of targets, the data required and the frequency of reporting.

8.	**To what extent do you agree with the further actions to 2030 listed across the Strengthen the circular economy strategic aim?** **Please provide evidence to support your answer if possible**

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Scottish Water supports the further actions listed. We favour developing a public procurement approach in line with the Climate Change (Scotland) Act 2009. We welcome the opportunity to offer green skills, training and development opportunities. Specifically, we would strongly support further work to identify areas where regulation under section 82 & 82A of the Climate Change (Scotland) Act 2009 could "require contracting authorities to purchase goods with recycled content, recycled products or recyclable products." (p85 of the consultation document). This would support market development for resource recovery activities.

	PART B – IMPACT ASSESSMENTS
9.	**Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment.**

No comment

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

No comment

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

No comment

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

No comment

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

We recognise the need for environmental baselining as a step towards monitoring progress towards the desired outcomes.

Water scarcity and stress are mentioned as big challenges in the introduction section of the Scotland's Circular Economy and Waste Route Map to 2030 Consultation

SW Public General

document (page 5 and 14) but not clearly linked to any actions.

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.**

The cumulative effect of SEA Table 1 (Summary of overall results of the SEA Scotland's Circular Economy and Waste Route Map to 2030 Strategic Environmental Assessment Environmental Report) shows that unknown negative effects may arise during the implementation of the strategy. We would wish to understand how these +/? effects will be monitored and mitigated for whilst the strategy is being implemented, in order to protect water use and the water environment.

Reducing the amount of water we all use can help decrease our energy use, and in turn help cut Scotland's CO_2 emissions (https://www.scottishwater.co.uk/-/media/ScottishWater/Document-Hub/Your-Home/Water-Efficiency/270718ScottishWaterWaterEfficiencyJun16.pdf)

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

No comment

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

We welcome the topic areas outlined in the SEA Environmental Report and agree that scoping is required.

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