

Delivering Scotland's Circular Economy: a route map for 2025 and beyond

Overview

<i>General Comments</i>
<p>Scottish Water is supportive of the move to a Circular Economy. This is embedded in our Strategic Plan to ensure we can deliver a sustainable service for our customers, now and in the future.</p> <p>While we welcome the publication of the Scottish Government's draft route map to 2025, we would encourage a longer-term position on ambitions and directions. Circular Economy thinking aligns strongly with Scotland's biodiversity, climate change mitigation and economic ambitions and this could be strengthened.</p> <p>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. Moving towards a Circular Economy also needs clear policy signals to ensure that markets adjust, and supply chains adapt to operate in a Circular Economy.</p>

Detailed Response

<b>Specific Comments</b>
<p>We suggest a review of current legislation, policy, quality measures and targets to ensure no unintended barriers to moving to Circular Economy approaches.</p> <p>For example, please see response to Question 6, below.</p>

1	<b>To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use? Please provide evidence to support your answer if possible.</b>
	<ul style="list-style-type: none"> <li>• Strongly agree</li> <li style="background-color: yellow;">• Agree X</li> <li>• Neither agree nor disagree</li> <li>• Disagree</li> <li>• Strongly disagree</li> <li>• Not answered</li> </ul> <p>Scottish Water supports the Scottish Government's proposals to promote responsible consumption, especially around water use. We are strongly 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 from 2025. Both proposals could help reduce the impact these items have on our network operations.</p>

<b>2</b>	<b>Are there any further measures that you would like to see included in the Route Map to promote responsible consumption, production and re-use?</b>
<p>Scottish Water would like to emphasise the importance of the clear labelling of products so that product composition is obvious as is how it should be recycled or disposed of safely. This is particularly important for items such as wet wipes, sanitary products, PPE and tampons that are often inappropriately flushed down the toilet or otherwise end up in our network. In 2020 there were around 36,000 blockages within the public wastewater network, over 80% of which were due to inappropriate disposal of items. These 36,000 blockages cost around £7 million to clear.</p> <p>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.</p> <p>The introduction of a Repairability Index e.g., as in France, and a minimum recycled material product content for products would assist organisations in making more circular procurement decisions.</p> <p>We would also like to see awareness raising of consumption of materials including water.</p>	
<b>3</b>	<b>To what extent do you agree with the measures proposed in this package to reduce food waste?</b>  <b>Please provide evidence to support any identified opportunities and challenges associated with the measures in your answer if possible.</b>
<ul style="list-style-type: none"> <li>• Strongly agree</li> <li>• Agree</li> <li>• Neither agree nor disagree</li> <li>• Disagree</li> <li>• Strongly disagree</li> <li>• <b>Not answered X</b></li> </ul>	
<b>4</b>	<b>Are there any further measures that you would like to see included in the Route Map to reduce food waste?</b>
<p>For food manufacturing waste – Scottish Water would support the encouragement of recovery at source eg for nitrogen-based trader discharges.</p>	
<b>5</b>	<b>To what extent do you agree with the measures proposed in this package to improve recycling from households?</b>  <b>Please provide evidence to support your answer if possible.</b>

<ul style="list-style-type: none"> <li>• Strongly agree</li> <li>• Agree</li> <li>• Neither agree nor disagree</li> <li>• Disagree</li> <li>• Strongly disagree</li> <li>• <b>Not answered X</b></li> </ul>	
<b>6</b>	<p><b>Are there any further measures that you would like to see included in the Route Map to improve recycling from households and incentivise positive behaviours?</b></p>
<p>Scottish Water would welcome a review of Scottish Government policies<sup>1, 2</sup> 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.</p> <p>This is potentially limiting opportunities, particularly in rural areas where PAS-compliant 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 (eg 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.</p> <p>Our recent work on co-digestion with SEPA and Chivas Brothers is a good example of how we can maximise the value of this type of waste.</p> <p><a href="https://www.scottishwater.co.uk/About-Us/News-and-Views/2022/04/070422-Nigg-co-digestion">https://www.scottishwater.co.uk/About-Us/News-and-Views/2022/04/070422-Nigg-co-digestion</a></p> <p><small>1 Scotland's Zero Waste Plan, Annex A, 2010 2 Guidance on Applying the Waste Hierarchy, 2017</small></p>	
<b>7</b>	<p><b>To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses? Please provide evidence to support your answer if possible.</b></p>
<ul style="list-style-type: none"> <li>• Strongly agree</li> <li>• <b>Agree X</b></li> <li>• Neither agree nor disagree</li> <li>• Disagree</li> <li>• Strongly disagree</li> <li>• Not answered</li> </ul> <p>Waste zoning approaches would be beneficial to the recycling rates for our offices and laboratory sites with improvements to carbon accounting and end-destination reporting encouraging behaviours.</p>	

<b>8</b>	<b>Are there any further measures that you would like to see included in the Route Map to improve waste recycling from commercial businesses?</b>
<p>Scottish Water would like to see a national database of Scottish business waste that can be used by other businesses to create products and facilitate the reuse of waste streams.</p> <p>We also propose more focus on product labelling for products that contain recycled or repurposed material. This would support market development for recovered products and recycled products.</p>	
<b>9</b>	<b>To what extent do you agree with the measures proposed in this package to embed circular construction practices?</b> <b>Please provide evidence to support your answer if possible.</b>
<ul style="list-style-type: none"> <li>• <b>Strongly agree X</b></li> <li>• Agree</li> <li>• Neither agree nor disagree</li> <li>• Disagree</li> <li>• Strongly disagree</li> <li>• Not answered</li> </ul> <p>Scottish Water strongly supports the proposals to embed circular construction practices which will reduce resource needs, waste and carbon and encourage refurbishment and reuse. As a business that needs to regularly carry out excavation activities, we would strongly support the proposals to find alternative uses for unavoidable soils and stones, including the development of a soil symbiosis programme.</p> <p>Scottish Water fully supports a programme for Reuse of Construction Materials and Assets, and we would like to be involved in its development.</p>	
<b>10</b>	<b>Are there any further measures that you would like to see included in the Route Map to embed circular construction practices?</b>
<p>We would welcome a stronger drive to reuse excavated material locally on site and encourage a review of legislation, policy, product quality requirements and targets to ensure there are no barriers in place to prevent moving this forward.</p> <p>Scottish Water would like to see recognition and incentives for organisations to approach construction in a Circular manner.</p> <p>We also propose a public alternative construction materials library/database to be used by all businesses at design stage to reduce virgin product use in construction.</p>	
<b>11</b>	<b>To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste?</b>



	<b>Please provide evidence to support your answer if possible.</b>
	<ul style="list-style-type: none"> <li>• Strongly agree</li> <li>• Agree</li> <li>• Neither agree nor disagree</li> <li>• Disagree</li> <li>• Strongly disagree</li> <li>• Not answered X</li> </ul>
12	<b>Are there any further measures that you would like to see included in the Route Map to minimise the impact of disposal?</b>
	<p>We would like to see differentiation between incineration and gasification/pyrolysis activities, which Scottish Water is investigating, to avoid any unintended consequences or missed opportunities in incineration.</p> <p>Unavoidable wastes eg from wastewater treatment, can still contain valuable resources and these should be evaluated before final disposal.</p>
13	<b>To what extent do you agree with the measures proposed in this package to support action across the Circular Economy?</b> <b>Please provide evidence to support your answer if possible.</b>
	<ul style="list-style-type: none"> <li>• Strongly agree</li> <li>• Agree X</li> <li>• Neither agree nor disagree</li> <li>• Disagree</li> <li>• Strongly disagree</li> <li>• Not answered</li> </ul> <p>Scottish Water believes that consideration of the onward use of materials is integral to the Circular Economy and would strongly support the inclusion of proposals to investigate and develop market opportunities that maximise the value of waste in the Route Map.</p>
14	<b>Are there any further measures that you would like to see included in the Route Map to support action across the Circular Economy?</b>
	<p>We would welcome the introduction of Circular Economy requirements for public organisations using consistent metrics across organisations.</p>
15	<b>To what extent do you agree with the principles proposed to underpin future Circular Economy targets?</b> <b>Please provide evidence to support your answer if possible.</b>

- **Strongly agree X**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not answered

Three of the four principles outlined are already included in Scottish Water's Vision and our Circular Economy Approach. Aligning with the EU would allow trade in circular products outside the UK, increasing their value.

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