

# Delivering Scotland's circular economy - route map to 2025 and beyond: consultation

Response from the Advisory Committee on Packaging (ACP)  
22/8/2022

1. We support defining a circular economy as one in which resources are kept in use for as long and as much as possible. In other words, output per unit of resource needs to be maximised.
2. Along with that we also support minimising carbon dioxide emissions for the economy or system as a whole and quantifying greenhouse gas emissions at as small a unit as possible.
3. To further a circular economy having a waste hierarchy that everyone works to – reduce, reuse/refill, recycle, renew – makes sense. However, going from that to a more self-sufficient or less import-sensitive economy is dangerous. That would lead to more expensive and possibly poorer-quality goods and services. Scottish people would have to pay for these consequences.
4. That is because economic history shows that a few universal truths apply to make an economy efficient. First, economies of scale. The larger the size of operation the smaller the mean cost of output. You yourself acknowledge that many supply chains are organised internationally. The basis of that is scale economies. Locally-produced salmon bought locally per force is likely to cost much more than salmon bought without recourse to source of production.
5. Second, specialisation and comparative advantage. None of us can do everything. All of us gain if we specialise in outputs where we have “comparative advantage” and then trade with others so that the benefit of their comparative advantage is gained. We would encourage you to think of as large a scale of operation as possible (rather than hamstringing business to a small area) and then to support specialisation for comparative advantage.

## Package 1: Promote responsible production, consumption and re-use

6. We do not think any new powers or legislation are necessary for the Scottish Government in this regard. Dialogue and communication with householders and businesses to change habits towards reduce, reuse/refill, recycle, renew would be welcome. Furthering the circular economy with producers would also be welcome without asking them to confine themselves just to Scotland. Using provisions within UK’s Extended Producer Responsibility to incentivise or penalise would be appropriate; separate charging such as for grocery bags is also recommended.

## Package 2: Reduce food waste

7. Incentivising local authorities to segregate waste by material or use such as food waste, maximise recycling and bringing those with lower rates to the best are recommended. Talking to householders and business so that habits improve would be welcome. Introducing

penalties and incentives so that households buy smaller quantities and businesses produce smaller packages while minimising waste could be tried.

### Package 3: Improve recycling from households

8. We believe that local authorities' kerbside recycling systems are the jewel in the waste business crown. We support incentivising local authorities and households to do more to segregate waste by material or use, maximise recycling and bringing those with lower rates to the best.

### Package 4: Improve recycling from commercial businesses

8. We support carrying out research on zoning approaches to see if they are more cost-effective than present systems. We support extending the UK's Extended Producer Responsibility regime to business waste in stages.

### Package 6: Minimise the impact of disposal

9. We support measuring carbon dioxide emissions at as small a unit as possible. We also support increases in landfill and incineration taxes.

10. We are not convinced your impact assessments are a fair reflection of your proposals. New legislation and measures of the type you propose are likely to be inflationary or more burdensome for businesses and households. Scottish people would have to pay for these and poorer people would be more affected; acknowledging that would be welcome.

11. We will be happy to discuss these with you.