

## Scottish Parliament Consultation:

### Net Zero, Energy and Transport Committee's Call for Views on the Circular Economy Bill

#### Scottish Youth Parliament Response - August 2023

##### Our recommendations in summary

1. The Circular Economy Bill should not focus on penalising consumers, instead it should concentrate on ensuring businesses and producers are responsible for their waste and have sustainable products and services.
2. Alongside potential additional charges on single-use items that could burden lower-income households, the Scottish Government should also do more to make alternative sustainable options more affordable and high-quality as well as encourage the culture in Scotland to change from a throw-away society.
3. Punishment to change household recycling behaviour should be the last measure, as households might be charged unfairly due to inaccessible and underfunded waste facilities, people outside of the household using bins, and not enough awareness being raised about correct waste disposal.
4. Restrictions on the disposal of unsold consumer goods should be introduced to encourage more circular business models and to promote the value of environmental and social impacts alongside economic growth.
5. More must be done to prevent greenwashing, including sharing publicly (in an accessible way) the information on what businesses store and dispose of.

##### Introduction

###### Who We Are

The Scottish Youth Parliament - [www.syp.org.uk](http://www.syp.org.uk)

The United Nations Convention on the Rights of the Child (UNCRC) is the basis for the Scottish Youth Parliament's (SYP's) vision, mission and values. In particular, SYP embodies Article 12 of the UNCRC, which states that young people have the right to express their views freely and have their opinions listened to in all matters affecting them. As a completely youth-led charity, the words and sentiment of Article 12 have profound importance for our work.

###### Our Values

- **Democracy** - We are youth-led and accountable to young people aged 14 to 25. Our democratic structure and the scale of our engagement across Scotland gives us a mandate that sets us apart from other organisations.
- **Rights** - We are a rights-based organisation. We are passionate about making young people aware of their rights and ensuring that local and national governments uphold their rights.

- **Inclusion and Diversity** - We are committed to being truly inclusive and work tirelessly to ensure policymakers and politicians hear the voices of young people from every community and background in Scotland.
- **Political Impartiality** - We are independent from all political parties. By working with all stakeholders, groups, and individuals who share our values, we deliver the policies that are most important to young people.

### Our Approach

As a youth-led organisation, we are constantly seeking the views of our MSYPs and other young people to ensure our policy positions represent their views as clearly as possible. To ensure our response can accurately reflect the views of our members and the young people they represent, we pulled our information from various sources.

SYP has responded to previous Scottish Government consultations on the Circular Economy Bill, including in December 2019 (available [here](#)) and August 2022 (available [here](#)). Scotland's transition still remains a priority for young people, and the Climate Crisis, with a focus on the Circular Economy, was chosen to be one of SYP's campaign priorities for 2021-2023. Our response uses young people's views collected in these pieces of work, in addition to work for our current campaign priority.

The consultations referenced in this response include:

#### **Focus group (July 2023)**

To help respond to specific questions in the *Call for Views* we held a focus group with members from our Transport, Environment and Rural Affairs Subject Committee, External Affairs Subject Committee, and Campaign Delivery Group for the Circular Economy campaign priority. The focus group took place online, on Wednesday 26<sup>th</sup> July 2023 with 9 MSYPs in attendance.

The group focused on four key aspects of the Bill that will impact the young people they represent or contribute to producers taking responsibility (which young people identified as a priority in relation to climate justice):

1. Restriction on the disposal of unsold consumer goods (Section 8)
2. Charges for single-use items (Section 9)
3. Household waste recycling (Section 12)
4. Reporting on waste and surpluses (Section 17)

#### **SYP's 2021-2026 Manifesto**

The calls in SYP's 2021-2026 Manifesto (available [here](#)) came directly from young people aged 12-25 across Scotland. The consultation as a whole was led by MSYPs and supported by the staff team. Due to the innovative and multifaceted approach we took to this manifesto, we do not have the exact number of young people engaged throughout this process. However, we estimate this to be around 10,000.

## #WhatsYourTake online survey (March 2020)

SYP's March 2020 #WhatsYourTake online survey (available [here](#)) was open from 21st February until 25th March 2020, gathering 287 responses from young people aged 12-25 across Scotland, from 31 local authorities, our 11 national voluntary organisations, and various others representing a diverse range of communities of interest and lived experience (including youth voice organisations, student unions, a range of cadets, and various sports clubs).

## Pack it up, Pack it in report (2019)

Our 2019 Pack it up, Pack it in report (available [here](#)) outlines young people's views and experiences of litter, single-use packaging, and recycling in Scotland, and makes eight recommendations to reduce pollution levels which contribute to climate change in Scotland. The report asked respondents a number of questions relevant to this proposal.

## SYP Policy passed as a Members' Motion

At SYP Sittings, the membership gets together and has the opportunity to propose Member Motions that will become SYP policy statements. To submit a motion, they will have consulted with young people in their constituencies to demonstrate it is an issue important to young people. At the Sitting, the membership then votes on whether the motion should pass, again based on consultation of the proposed Motions with their constituents. By way of example, at the last SYP Sitting, SYP79 in July 2023, nearly 5000 young people were consulted before MSYPs voted on Members' Motions.

## Questions

### Part 1: Circular Economy Strategy

<b>Is a statutory requirement needed for a circular economy strategy?</b>
<i>No response.</i>
<b>Is there anything else you would like to say about the circular economy strategy?</b>
To help respond to specific questions in the Call for Views we held a focus group with members from our Transport, Environment and Rural Affairs Subject Committee, External Affairs Subject Committee, and Campaign Delivery Group for the Circular Economy campaign priority. The focus group took place online, on Wednesday 26th July 2023 with 9 MSYPs in attendance.  A key overarching recommendation that MSYPs felt strongly about was that the Circular Economy Bill should not focus on penalising consumers. Instead, it should concentrate on ensuring businesses and producers are responsible for their waste and have sustainable products and services.

MSYPs have been advocating for urgent action in response to the climate emergency for many years: “The Scottish Youth Parliament believes that there is a global Climate Emergency and calls on local and national decision-makers to prove that they urgently give priority to tackling climate change” (94% agreement, Member’s Motion passed in 2019).

The Circular Economy Bill was recognised by the current membership as an instrumental way of doing this that young people could participate in and was selected to be a campaigning priority. In June 2023, SYP had its annual meeting with the Scottish Cabinet and spoke about this campaign (speech found [here](#)). Three key asks were made, selected due to their importance to the young people we have spoken to throughout the campaign:

1. Bold and accountable targets are crucial.
2. Measures to reduce waste in fashion should be included in the Circular Economy Bill.
3. A committee of young people should be created that can meaningfully participate in the implementation of the Circular Economy Bill.

Alongside these key asks, the Circular Economy Bill should work with other Government strategies to tackle the nature and biodiversity crisis: “The Scottish Youth Parliament believes that, in order to ensure the future of young people everywhere, decision makers should take more action to protect Scotland’s natural environment and biodiversity” (96% agreement, Member’s Motion passed in 2022).

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

*No response.*

## **Part 2: Circular economy targets**

*No response.*

## **Part 3: Restrictions on the disposal of unsold consumer goods**

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

Restrictions on the disposal of unsold consumer goods should be introduced to encourage more circular business models and to promote the value of environmental and social impacts alongside economic growth.

**Is there anything else you would like to say about the disposal of unsold consumer goods?**

The young people we spoke to in the focus group explained that currently huge amounts of waste are being produced to keep up with consumer trends, such as those in fast fashion. They believed that restrictions on the disposal of unsold goods would help change business models and reduce waste being thrown away.

They also expressed how difficult it was to keep up with whether a business was sustainable. Therefore, they believed the responsibility to transition to sustainable practices should rely on all businesses, rather than young consumers having to do their own investigations. They said that introducing a common standard through the restrictions on the disposal of unsold goods would help do this, as the time, effort, and cost to respond to this new legislation would lie with businesses.

When asked what types of restrictions could be introduced, they responded that unsold consumer goods should be recycled or donated to those who need them. They argued that removing the profit incentive by ensuring goods are donated would encourage businesses to reduce production and have a positive environmental impact. Meanwhile, donating unsold consumer goods could have a positive social impact, which they believed should be promoted and valued more highly. However, they cautioned against restrictions that would lead to mass goods being exported to landfills in other countries, so the quality and desire for donated goods must be assessed.

One MSYP said: *“Businesses view their aim as continuous annual growth. They’re always looking for how to cut costs, but environmentally friendly ways can be more expensive. The Bill could advertise the benefits of not always growing and just having profit - being ethical is good, rather than growing for the sake of it.”*

#### Part 4: Charges for single-use items

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

Additional charges on single-use items could risk burden lower-income households. Therefore alongside potential additional charges, the Scottish Government should also do more to make alternative sustainable options more affordable and high-quality as well as encourage the culture in Scotland to change from a throw-away society.

##### **Is there anything else you would like to say about charges for the supply of single-use items?**

SYP supports efforts to reduce single-use items:

*“SYP recognises the negative impact single-use plastics are having upon the environment, and calls on the Scottish Government, local authorities, and businesses to take more action to reduce plastic consumption.”* - 91% agreed, Member’s Motion passed in 2019.

However, responses to our ‘Pack it up, Pack it in’ report (2019)(available [here](#)) demonstrated that young people’s support for charges for environmentally harmful items appears to be relatively low in comparison to other measures, as outlined below.

In response to the question ‘What would encourage you to use environmentally friendly alternatives more often?’, a small number of respondents said they

would be encouraged to use environmentally friendly alternatives if there were incentives such as discounts or rewards (9.8%); if ‘un-friendly’ products were banned (6.5%); or if there was a fine or other penalty for not using reusable packaging (3.1%). On the other hand, the vast majority said they would use environmentally friendly alternatives more often if they were cheaper or free (24.2%); if they were more readily available and visible in shops and eating establishments (19.5%); or if it was easier to use them, for example, if more establishments encouraged their use, if there were more water refill stations, or if there was somewhere to wash the items between uses (12.4%).

This was echoed in our recent focus group in July 2023, where the young people we spoke to suggested that small additional charges probably wouldn’t deter people from using them. Moreover, they were concerned that the additional charges could add up and burden lower-income families or those who rely on single-use items, whereas those with higher incomes can afford to pay the charges.

One MSYP who has been campaigning for banning single-use vapes said: “*There is concern that [if there is a single-use vape ban] that people might buy normal vapes and throw them away because they are still cheap.*” This highlights that without supporting culture change, alternative products that are valued as more sustainable due to them lasting longer could result in more environmental harm if they are increasingly thrown away.

Due to this, the young people in the focus group suggested additional charges would need to be accompanied by further awareness raised on the impacts of single-use items, the availability of higher quality and accessible alternatives, and encouraging culture change so people use an item until it needs to be replaced. Furthermore, one young person suggested that single-use items with sustainable alternatives that are accessible and affordable should be banned or replaced completely with biodegradable options.

Additionally, young people we spoke to expressed concerns that this was charging consumers rather than businesses for the shift to a circular economy. They suggested this wouldn’t be popular and phrasing it as an environmental levy that explains the benefit of the charge could be useful.

Furthermore, SYP’s 2021-2026 Manifesto (available [here](#)) states “*the food and retail industry should:*

- *make it possible to recycle and reuse packaging.*” - 94% agree
- *avoid using too much packaging in their products.*” - 91% agree
- *make it possible for people to rely less on packaging made out of plastic.*” - 89% agree
- *make it possible for people to rely less on packaging that can only be used once.*” - 86% agree
- 

We therefore call on decision-makers to ensure support is available for businesses to enable them to reduce their provision of single-use items and to avoid passing on any additional cost to consumers. This is particularly important in light of the rapidly increasing cost of living, to ensure those living in or at risk

of poverty are not negatively impacted by the implementation of charges on environmentally harmful items.

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

*No response.*

## Part 5: Household waste

*No response.*

## Part 6: Household waste recycling - Code of Practice and local targets

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

Punishment to change household recycling behaviour should be the last measure, as households might be charged unfairly due to inaccessible and underfunded waste facilities, people outside of the household using bins, and not enough awareness being raised about correct waste disposal.

**Is there anything else you would like to say about the Code of Practice on household waste recycling?**

In the 'Pack it up, Pack it in' report (2019)(available [here](#)), in response to the question "what, if anything, would encourage you to start recycling, or to recycle more?", a small number of respondents said they would be encouraged to recycle if there were charges for not recycling (17.4%), or if there were incentives to recycle (17.1%). On the other hand, the vast majority of respondents who answered this question said they would be encouraged to start recycling, or to recycle more, if there were better or more facilities for recycling. Over half would be encouraged to recycle if there were more recycling bins in public places (56.1%), or in schools, colleges, and universities (36.8%). One third of respondents (33.7%) would be encouraged to recycle if they could recycle more types of litter in their area, and one fifth said recycling bins should be emptied more often (20.4%). Just over one tenth (12.7%) would like to see more recycling centres in their area, and a further tenth would recycle if there was a recycling bin in their house (10.4%).

The findings indicate that young people believe introducing warnings and penalties for incorrect disposal of household waste would not be the most effective measure to increase recycling for young people. Raising awareness and increasing accessibility would be more desired.

In the focus group, young people were very concerned about this proposal, questioning its fairness. They cited that the cost could be unfairly placed on households due to:

- People outside of households incorrectly disposing of waste

- “this applies to myself and many of my constituents. We have shared bins at the end of the streets and lots of tourists add to them. I would be worried this would unfairly impact us.”
- “I recently had to help my nan deal with an incorrect fly tipping fine, someone else had fly tipped outside her house. This took a lot of time and was hard to sort out for me. I’d be concerned the bureaucracy of waste and sorting fines out could become a big problem.”
- Recycling services not accessible
  - “in my local authority, you need a £40 permit to have garden waste collected. This impacts low-income families. There are places to dispose of for free, but I don’t have a car to reach it.”
  - “My council has recently shut 2 recycling centres and re-located them (now a 10 miles car journey or pay to take it somewhere else) - this is not accessible.”
  - “Need recycling centres to be funded and open first!”
- Lack of awareness about correct procedures
  - “Sometimes incorrect disposal is to do with laziness, but it will also negatively impact people who don’t know what to do and aren’t doing it on purpose. This could include low income families.”
  - “If people aren’t given the correct information - are they really at fault?”

Building on the last concern expressed in the focus group about a lack of awareness, the responses in the ‘Pack it up, Pack it in’ report (2019)(available [here](#)) indicated that education was a main barrier to recycling for young people. In response to the question “*which of these items can currently be recycled in your area?*”, respondents were aware that more commonly-recycled items can be recycled in their area. However, there was less awareness of whether or not items such as drinks cartons, clothes, plastic bags, small electrical items, or batteries can be recycled in their area. Young people were then asked to identify whether they already knew this information, or whether they looked it up in order to answer the question. Whilst the majority said they already knew, a small number said they did not and had found it difficult to find the answer. Some respondents felt information is directed at homeowners and is therefore not accessible to young people. This suggests there is an issue relating to awareness and information about what can and can’t be recycled across Scotland.

The results of the report also showed that over two thirds (70.2%) were driven by environmental reasons to recycle. For young people, the desire to recycle is there, but more support is needed to raise awareness about the correct way to do it. Therefore, legislation that increases pressure on the household to be responsible for their own waste must be accompanied by education for young people and communities in Scotland.

*“Local Authorities and the Scottish Government should continue to raise awareness amongst young people to help them understand what can be recycled, and when recycling is collected, in their communities.” -*



Recommendation from SYP's Pack it up, Pack it in report - November 2019 (available [here](#)).

In the focus group, all the young people agreed that before a fine or charge is placed *“there needs to be more steps before this - such as empowerment and communication - punishment should be the last step.”* Overall, they were keen for a higher value to be placed on recycling in society but cautioned against harsh punishments that could criminalise and fine people who would be correctly disposing of waste if they knew how or had access.

**Should Scottish Ministers have powers to set targets for local authorities related to household waste recycling?**

*No response.*

**Is there anything else you would like to say about targets for local authorities relating to household waste recycling?**

*No response.*

**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?**

*No response.*

#### **Part 7: Littering from vehicles**

*No response.*

#### **Part 8: Enforcement powers in respect of certain environmental offences**

*No response.*

#### **Part 9: Reporting on waste and surpluses**

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

More must be done to prevent greenwashing, including sharing publicly (in an accessible way) the information on what businesses store and dispose of.

**Is there anything else you would like to say on reporting?**

In the focus group, the young people we spoke to believed this would have a positive impact. One young person said: *“it would be good for this to be made publicly available to create more accountability - this would be empowering to the consumer.”* The young people believed by making these practices more transparent and available to the consumer, people would be empowered to

make sustainable choices. In turn, this would help reduce green washing and encourage businesses to make real changes.

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

#### **Fashion waste**

Fast fashion was selected by the current SYP membership to become a campaign priority due to concern about the huge amount of waste being produced. In SYP's March 2020 #WhatsYourTakeSurvey (available [here](#)), young people answered that they would be encouraged to shop in a more sustainable way if sustainable fashion was more available in shops (36.2%) and if they knew how sustainable fashion was better for the environment (31%). More information on whether fashion companies' practices are sustainable and the benefits or impacts this is having would therefore empower young people to shop in a more circular way.

#### **Food waste**

SYP is in support of reducing food waste and the right to food being upheld (2021-2023 campaign priority). Mandatory reporting could help achieve this by reducing waste and identifying how to redirect it.

*'The Scottish Youth Parliament believes that legislation should be introduced to prevent the unnecessary disposal of unsold food by manufacturers, supermarkets, and other businesses, and ensure the food is instead donated to charity, or converted to animal feed, fertiliser or energy where appropriate.'* - 85% agree - Members' Motion passed March 2017

SYP's March 2020 #WhatsYourTake online survey (available [here](#)), respondents were asked, *'In order to reach our climate emission targets, as a society we need to look at how we create a food system which lowers emissions whilst ensuring a fair society for those who produce and consume products. Based on what you think you can do now to achieve this, please rank the below actions.'* Young people were asked to rank eight actions based on what they think they could do now to achieve this goal. The actions were ranked as follows:

1. Reducing and recycling food waste.
2. Buying locally sourced produce.
3. Buy less processed and packaged food.
4. Eating more seasonal fruit and vegetables.
5. Buying organic and sustainably approved options.
6. Growing your own fruit and vegetables.
7. Advocating for carbon labelling of all food products.
8. Eating less animal products (e.g. meat and dairy).

Based on these responses, the Scottish Youth Parliament recommended:

*'Steps should be taken to support suppliers and consumers to reduce and recycle food waste.'* - Recommendation from SYP's 2020 #WhatsYourTake report (available [here](#)).

**Part 10: Net Zero**

*No response.*

**Part 11: General/aspects not in the Bill**

*No response.*

**Part 12: Resources and Waste Common Framework**

*No response.*