

**PREVENTING  
HOUSEHOLD WASTE IN  
SCOTLAND**



**ANALYSIS OF  
CONSULTATION  
RESPONSES**



**SCOTTISH EXECUTIVE**



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HOUSEHOLD WASTE IN SCOTLAND  
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## **EXECUTIVE SUMMARY**

### **BACKGROUND OVERVIEW**

The consultation on Preventing Household Waste in Scotland was published by the Scottish Executive and SEPA on 6 February and ran until 28 April 2006.

Findings from the analysis of consultation responses, along with results from a consultation event and focus groups are intended to feed into the development of future plans for household waste prevention and an action plan on household waste prevention in Scotland. Results will also help to provide evidence to the Scottish Parliament's Environment and Rural Development Committee on the Member's Bill proposing a levy on plastic bags.

The consultation posed a series of 42 questions, focusing on the main issues raised in the consultation document, and which were divided into 5 main sections: product designers and manufacturers, retailers, consumers, communities and local authorities.

### **OVERVIEW OF RESPONDENTS**

A total of 170 responses to the consultation were received comprising 91 responses from organisations and 79 from individuals. Among organisations, the largest number of responses received was from local authorities while the consumer and political party sub-groups each submitted one response.

While the consultation document offered 42 questions for consideration, over half of all respondents (86) focused solely on the issue of the impact of plastic bags on the environment. This included a letter campaign which produced 37 identical responses.

### **KEY THEMES**

Across the consultation as a whole, there was a higher level of support – rather than opposition – for each of the proposals presented, although some respondents chose not to answer every question. Across the analysis as a whole, a number of key themes emerged and these are outlined below.

#### **A need for consumer education and information**

Many respondents noted a lack of awareness on issues surrounding household waste in Scotland. While this lack of awareness was primarily associated with consumers, there were also views that some individuals working within other sectors such as retail or manufacturing also lacked awareness of many of the issues to do with household waste. In line with this, many also perceived a need for concerted information and education campaigns to increase awareness and knowledge of key issues. The Scottish Executive was perceived to be the natural instigator of a nation-wide campaign that can present a clear and consistent message to consumers. This could then be backed up with further tailored campaigns at a local level.

## **A need for research**

In a number of instances, respondents noted a need for further research to be carried out. For example, many of the issues raised impact not only on Scotland but further afield and many respondents noted the usefulness of research to see what processes and procedures are being adopted in other countries and to learn from examples of “good practice”. In this way, Scotland can introduce tried and tested systems that are known to work.

## **A need for guidance and training**

Some respondents noted a need for guidance to be produced not only for consumers, but also for others (retailers, manufacturers, local authorities and so on) involved in waste management. There was a perception that this would help to bring about consistency of good practice across Scotland as a whole and ensure that good practice is shared across all relevant organisations.

In line with this need for guidance, some respondents also noted a need for training to be provided. For example, some noted that in order for local authorities to achieve targets that could be laid down by the Executive in relation to waste prevention, local authority officers would need training on the skills needed to encourage waste prevention. Across the consultation as a whole, there were a wide range of suggestions for areas in which training needs to be provided, albeit that some questioned where additional funding would come from.

## **The international nature of waste management**

While this consultation paper focused primarily on waste management in Scotland, there were acknowledgments that in many instances the issue of waste management falls under UK or EU guidelines and legislation. So, in some instances respondents noted the need for any changes in Scotland to meet with wider legislation and that it may not be possible to instigate initiatives on a Scotland-only basis.

## **The cost of implementation**

While there was broad agreement for the proposals as outlined in the consultation paper, there were some concerns that the cost of implementing specific measures might outweigh their environmental benefits. There were also some comments that funding would be needed to implement many of the new initiatives available, although there were queries as to which organisation(s) would be responsible for additional funding. For nationwide initiatives, the Scottish Executive was seen as the natural provider of funding.

## **PRODUCT DESIGNERS AND MANUFACTURERS**

There was broad agreement on the need to promote eco-design in Scotland, although preferences for the best way to achieve this varied. There was also support for carrying out further work on the waste profiles of products, although a range of different types of organisation were cited as warranting involvement in this. The highest level of support was for working with other government departments across the UK on either waste profiles or environmental profiles.

In terms of product life span specifically, a need was identified for providing better information to consumers and providing more support to companies. There were also suggestions for changes to marketing materials to help encourage consumers to move away from a “disposable” lifestyle to one based on repair, re-use and recycling.

For disposable products specifically, highest levels of support were for the introduction of producer responsibility legislation.

Respondents cited a need for campaigns to raise awareness of issues related to product design and manufacture and / or for education campaigns to help encourage better understanding of issues in relation to product design. Responses pointed to the need for a wide range of different bodies and organisations to work together on product design. The international nature of many of these issues was highlighted, with suggestions that some of these should be dealt with at a UK or EU level.

## **RETAILERS**

There was broad agreement of a need for guidance and support for retailers to build waste considerations into their procurement processes, and some suggestions that legislation is needed to back this up.

The need for further training for retailers and their employees was cited by many respondents, although views were split as to which organisations should have responsibility for its delivery and there were comments that training needs to be tailored to different sectors and / or products.

In terms of food waste specifically, respondents identified a need for retailers to provide more information to consumers. While there were concerns that this could lead to an increase in packaging, information relating to health and hygiene issues was seen to be a priority. There were some suggestions that more information could be provided in store rather than on product labelling itself.

There was general agreement that more could be done to collect and use surplus food from wholesalers, retailers, caterers and other outlets and support for greater promotion of schemes in relation to this.

Once again, education for consumers was perceived to be needed on issues in relation to food waste, although there were suggestions that retailers also need to consider actions they can undertake to help reduce levels of consumer food waste.

Views were relatively split as to whether the Packaging (Essential Requirements) Regulations 2003 are working. Some consultees noted that there is a lack of awareness of these regulations and others commented on a lack of enforcement that can undermine their credibility.

While views were split over which specific options could be utilised to minimise household waste from packaging, the majority of consultees supported some form of action. Other comments included suggestions for an increase in the number of collection schemes or recycling sites. While there was support for re-use through deposit and return schemes,

concerns were raised over their practicality and implementation and the type(s) of products best suited to these schemes.

There was broad support for more action to be taken to reduce waste from the retailing of products, although views on how this could be brought about varied. Almost half of the consultees perceived a need for retailers to provide consumers with information and noted the importance of any information being clear, meaningful, useful and accessible.

## **CONSUMERS**

There was majority support for further action to be taken to make it easier for consumers to raise environmental and waste issues with retailers and other providers of goods and services. That said, there were, once again, suggestions that consumers need to be educated to raise their awareness of the issues or how they can complain about excessive packaging. There were also suggestions of a need for a change in consumer attitudes to create less of a “disposable goods” lifestyle. In terms of unwanted mail specifically, a number of respondents noted the need for an increased awareness and promotion of the Mail Preference Service. There were also calls for more composting initiatives and/ or wider publicity for existing initiatives.

While initiatives such as home composting were welcomed, there were comments that home composting, rather than community composting, is not possible in all areas. One example given was city centre areas where there may be a high density of tenements.

There was a level of support for some form of environmental loyalty card, although there were some concerns about how such a scheme would operate.

## **PLASTIC BAGS**

Over half (86) of all respondents only replied to the questions relating to the issue of plastic bags (questions 19 and/ or 20). The majority of these respondents were in favour of no action being taken and that the issue should be given no priority or a low priority.

Of those who responded to the consultation paper as a whole; there was equal support for promotion of voluntary measures by retailers and other bodies handing out plastic bags, or for the introduction of a levy on plastic bags as proposed by Mr Pringle’s Bill. A high level of priority was favoured by these respondents.

Many consultees felt that plastic bags are already re-used by many households while a number felt that action on plastic bags could be a symbolic step which would serve to raise awareness of wider waste and resource use issues.

## **COMMUNITIES**

There was a general view that more could be done to take a Scotland-wide overview of the re-use of products such as furniture, paint and carpets, although many cited a need for more information or education for consumers and encouragement for those working in the re-use

and repair sector. That said, there were also comments that it can be difficult to persuade consumers to consider re-use or repair for some low cost items, particularly if the cost of repair is high in comparison to purchase of a new product. There were also suggestions for a sustainable and national network of schemes and the social benefit that this can bring to Scotland.

The concept of community composting was supported by some consultees, although it was thought that this would work better in some communities than others.

A greater number of consultees supported non mandatory recycling credits rather than mandatory. Alternatives suggested including giving local authorities decision making powers on this issue or development of service level agreements. There was also less support for extending recycling credits to re-use and / or waste prevention.

## **LOCAL AUTHORITIES**

A number of consultees agreed with the proposal for Scottish local authorities to adopt a similar approach to that adopted in the London Borough of Barnet, and some noted that some Scottish local authorities already operate similar schemes.

When asked specifically about the size of bins provided by local authorities for residual waste, the greatest level of support was for **advice** on the size of residual bins and frequency of collections (the highest level of support coming from local authorities). However, there were some comments that services need to be tailored to specific areas or types of household.

In terms of green waste collection specifically, there was support for further research and guidance on green waste composting to minimise the effect on waste arisings. Again, there were some calls for this to be tailored to individual areas. There were some concerns that kerbside collection serves to discourage composting.

While there was support for the Executive to consider amending the existing regulations allowing charges to be made for the collection of other types of household waste, there were some concerns over a possible increase in fly-tipping or other illegal disposal practices.

Views on whether or not the Executive should consider issuing guidance on charging for special uplifts of bulky items and garden waste were split. If guidance is to be issued, the main point raised by consultees was the need for a fair, consistent, basic charging structure and guidance on this.

From those commenting, while there was majority support for direct variable charging the key issue to emerge was concern over a possible increase in flytipping or other practices. In addition, respondents felt that flexibility was needed to enable local authorities to exercise local discretion. Some local authorities also highlighted the need to change consumer behaviour and expressed the opinion that charges could help to do this. There was some support for further research into the effects of charging. Similarly, there was majority support for the Executive to carry out further work on incentives, with some consultees noting the importance of “positive” incentives to help bring about waste awareness. A pilot scheme was suggested by some consultees.

A greater proportion of consultees agreed with the proposal for waste management contracts or service level agreements to include incentives for waste prevention than disagreed. A significant number also noted that there was scope for provisions on waste prevention in local authority contracts for products and services (other than waste management).

A majority of consultees agreed that the Executive should take action to ensure local authorities do more on waste prevention, although funding for this was perceived by some to be an issue. It was also noted that other types of organisations also have a part to play in this. In terms of setting targets for local authorities in relation to waste prevention, a greater number of consultees agreed with this than disagreed, although there were some queries as to what targets should be set against. Some respondents also noted a need for training in this area.

There were some comments on the need to allocate more money to waste prevention, although there are concerns as to what the position will be in 2007-08 when Strategic Waste Fund resources from Phase 1 will no longer be ring-fenced.

# **CHAPTER 1 : BACKGROUND**

## **1.1 BACKGROUND**

### **Household waste in Scotland**

In 1999, the National Waste Strategy was published outlining ways in which Scotland can move towards more sustainable waste management through decreasing landfill waste and promoting recycling and reuse. In order to implement this strategy, the National Waste Plan (published in 2003) set out the basis for a fundamental shift in the management of Scotland's resources. This plan focuses on the behavioural change that is needed to reduce the waste generated in Scotland and on the opportunities that exist from a more rational approach to resource management. This plan sets out a long term programme for the delivery of change needed in relation to sustainable waste management.

A key aim of the National Waste Plan is to stop the growth in municipal waste by 2010. While there are already a number of waste prevention measures in place such as those being carried out by the Waste and Resources Action Programme (WRAP), there is an acknowledged need to consider all aspects of waste prevention and what more can be done by designers, manufacturers, retailers, consumers, communities, local authorities and the Government.

At present in Scotland over 3.3 million tonnes of municipal waste enters the waste stream each year and the majority of this is generated by households. Figures show that in 2003-4 Scottish households produced around 2.6 million tonnes of waste and that this figure is increasing by around 2% per year. A number of reasons are attributed to this trend and these include:

- increased disposable income, (fuelling demands for consumer products);
- more single person households;
- an increasing convenience led lifestyle;
- fashion trends;
- changing attitudes;
- the low cost of food.

### **The current picture**

Work is being carried out at every level in Scotland in order to meet the aim set in the National Waste Plan. WRAP and ReMaDe Scotland are working to develop markets for recycled materials, while in local authority areas and local communities a range of activities and campaigns are helping to change habits and attitudes. The Scottish Waste Awareness Group (SWAG) are working with Scottish local authorities and community groups to raise awareness of waste reduction, reuse and recycling. The 'Sort-It' website includes a range of information on how householders can reduce, reuse and recycle waste and is searchable by geographical area. 'The Big Recycle for Scotland' is also an annual campaign run to complement the work being carried out by SWAG throughout the year.

Promotion of recycling and composting services aims to increase the amount of waste processed in these ways with a target of recycling or composting 55% of waste collected by local authorities by 2020. Funding and support is being provided at a national level with over £350 million allocated to the Strategic Waste Fund in order that local authorities can put in place the infrastructure needed to deliver these changes.

## **Waste prevention**

Although work is underway to promote the recycling, reuse and composting of Scotland's waste, initiatives are also needed to prevent the amount of waste being generated. Waste prevention is at the very top of the waste hierarchy and steps are needed both to reduce the amount generated and to ensure any waste that is produced will not pose a hazard to the environment.

While there are a range of policy tools available to tackle waste prevention, the Scottish Executive and SEPA are keen to obtain the views of a range of stakeholders to ensure that steps can be taken that will truly lead to tangible benefits. Consideration is needed as to the impact and effectiveness of the policy tools available which include:

- Local taxation;
- Legislation to ban the use or disposal of some types of materials;
- Incentive schemes;
- Education to raise awareness and promote change;
- Voluntary agreements and partnership working.

### **The Scottish Executive (Waste and Pollution Reduction Division, Waste Strategy Team)**

The Scottish Executive, through the Environment and Rural Affairs Department, supports a variety of measures and initiatives aimed at meeting the targets set in the National Waste Plan. The Waste Strategy Team wishes to focus on targeting those areas of waste prevention with the potential to return measurable results in order to meet the aim of the Scottish Executive *“to help the people of Scotland secure a high quality of life through sensitive stewardship and sustainable development of the country's natural resources.”*

### **SEPA**

The Scottish Environmental Agency (SEPA) has a key role in the co-ordination of the National Waste Strategy. SEPA is a non-departmental public body established by the Environment Act of 1995 and is responsible for the protection of the environment in Scotland. Its core focus is protection of the land, air and water and this is managed in partnership with other organisations, in a way that enables Scotland to sustain a strong and diverse economy.

## **CHAPTER 2: THE CONSULTATION PROCESS**

### **2.1 THE CONSULTATION**

In order to meet the aim of stabilising growth in municipal waste by 2010, the Scottish Executive and SEPA are developing a Waste Prevention Action Plan for Scotland. A Waste Prevention Expert Group has been established to advise. The membership of this group is as follows:

- Scottish Executive (Chair)
- SEPA (Secretariat)
- CBI Scotland
- Waste and Resources Action Programme (WRAP)
- Scottish Retail Consortium
- Scottish Consumer Council
- Scottish Waste Awareness Group
- Community Recycling Network for Scotland
- Convention of Scottish Local Authorities (CoSLA)
- Scottish Environmental Services Association
- Department for the Environment and Rural Affairs (DEFRA)
- Scottish Environment Link

The consultation document – *Preventing Household waste in Scotland* – was issued on 6 February 2006 in order to obtain views on areas where attention should be focused, work can be targeted and results produced. The closing date was 28 April 2006. In total 170 responses were received, providing a wide range of views and information for consideration

### **2.2 NATURE OF THE CONSULTATION**

The consultation document (Appendix 1) set out the background to the consultation, highlighted the key aspects for consideration and posed 42 questions to which respondents were invited to respond - some of these offered options while others invited open responses. The document was split into 5 main sections; product designers and manufacturers, retailers, consumers, communities and local authorities.

The consultation document was issued by e-mail to a wide range of key stakeholders and trade press. The consultation paper was also available via the Scottish Executive website, and other individuals with an interest in this area were welcome to provide their views to any or all of the questions posed. A reminder e-mail was sent to consultees 10 days before the closing date of the consultation.

Respondents were invited to respond freely to each question in the consultation document. Some respondents answered each question while others chose to comment on a limited number of questions. Most chose to follow the question structure, although a small number provided comments in a free-flowing format.

In addition to the Consultation Document a consultation meeting was held in Glasgow on 6<sup>th</sup> March, and was attended by 33 people. This gave stakeholders the opportunity to ask questions of the consultation team, face to face, and to gather more in depth responses to particular issues. The points raised at this consultation meeting are included in this report, under the appropriate heading.

A third area of activity was a series of focus group meetings managed by the Scottish Waste Awareness Group (SWAG). Focus groups are carefully planned discussions designed to obtain perceptions on a defined area of interest in a permissive, non-threatening environment. These produce qualitative data that provides insights in to the attitudes, perceptions and opinions of participants. Focus groups involve the introduction of a selected series of topics by a skilled interviewer (moderator) to a group of six to eight members.

Four discussion groups took place between March and April 2006 with members of the public to seek their views and opinions on preventing household waste in Scotland. Each group lasted for a period of between one and one and a half hours commencing at 7.00pm and included refreshments.

The groups took place in the following locations;

- Glasgow 7<sup>th</sup> March 2006;
- Edinburgh 14<sup>th</sup> March 2006;
- Stirling 21<sup>st</sup> March 2006;
- Fife 18<sup>th</sup> April 2006.

All groups were moderated by Dr Nicki Souter. Upon completion of the groups each member received a £20 gift voucher.

The discussions were transcribed, and subsequently analysed, and the main findings included in this consultation analysis report under the appropriate heading.

## **CHAPTER 3: APPROACH TO ANALYSIS OF CONSULTATION RESPONSES**

### **3.1 INTRODUCTION**

George Street Research was commissioned to conduct an analysis of the consultation responses and this document constitutes the final report of this analysis. Findings from 4 focus groups and a consultation event conducted on a separate basis were supplied to us and our report notes any areas of difference and commonality between these and the consultation responses.

It is intended that these results will help to provide further evidence to the Environment and Rural Development Committee on the Member's Bill proposing a levy on plastic bags. It will also feed into development of future actions that could be taken by the Scottish Executive on household waste prevention and to feed into an action plan on household waste prevention in Scotland.

### **3.2 ANALYTICAL FRAMEWORK**

The analytical framework used in our analysis of the consultation responses was an electronic ACCESS database specifically written for this consultation. This enabled a combination of quantitative and qualitative analysis to be undertaken.

The fields used to record the material in the ACCESS database were based on the questions set out in the consultation document.

The text from free flowing responses was, where possible, assigned to a specific question and stored in the relevant field.

### **3.3 PUBLICATION OF WRITTEN RESPONSES**

Where respondents have agreed to publication, these responses are available in the Scottish Executive library. After discussion with the consultation team, the convention adopted for this consultation has been to preserve anonymity of individual respondents and organisations, but to attribute their comments and quotes to the grouped respondent category to which they fit. In this way, a further depth is added to the analysis by providing some contextual information about the respondent type.

### **3.4 GROUND RULES**

#### **Separate Responses from the Same Individual/Organisation**

On occasions, a respondent may send in more than one response. The consultation team at the Scottish Executive were primarily responsible for identifying and removing any such duplicates. The research team at George Street Research were also prepared for the possibility of double entries in that they ensured that any identical or duplicate responses that

had been missed were picked up and removed from the exercise. This was done by hand searching or electronic screening.

### **Quality Control**

In order to minimise any inconsistencies in approach the research team at George Street Research was kept to a minimum size with all working to a well tested set of rules for data examination and entry. In accordance with our standard practice members of the research team verified 10% of coding and data entry and highlighted areas where a second opinion was required.

### **Factual Accuracy**

The views presented in this analysis have not been vetted in any way for factual accuracy. The opinions and comments submitted to the consultation may be based on fact or may, indeed, be based on what respondents perceive to be accurate, but which others may interpret differently. It is important for the analysis to represent views from all perspectives. The report may, therefore, contain analysis of responses which may be factually inaccurate or based on misunderstanding or misinformation on the actual proposals but nevertheless reflect strongly held views. In some instances, such inaccuracies and misunderstandings will be relevant findings in themselves.

### **Interpretation of Findings**

Those participating in the consultation exercise were self selecting and each had their particular motivation to take part. The exercise was not intended to gain views that were representative of the Scottish population, but was intended to give all those who wished to comment an opportunity to do so. This has to be borne in mind in interpreting the findings presented here in this report.

**Given the self-selecting nature of any consultation exercise, it should be noted that any statistics quoted here cannot be extrapolated to a wider population outwith the consultation population.**

## **3.5 REPORTING**

The following chapters document the substance of the analysis, presenting the main issues, arguments and views expressed in the responses. These follow broadly the ordering of issues raised in the consultation document. Verbatim quotations have been taken from the database for illustrative purposes.

## CHAPTER 4: RESPONSES TO THE CONSULTATION

### 4.1 RESPONSES AND RESPONDENTS

The consultation documentation included a structured response form. While the majority of responses followed the structure of the questions asked in the consultation, a small number were presented in free-flowing format. Where possible, these comments were assigned to the relevant question.

Responses to specific consultation questions were analysed, with comments on each question grouped together, compared and where possible and useful, quantified.

A total of 170 responses to the consultation were received. **As table 4.1 illustrates, the largest number of responses among sub-groups (79) representing 46% of the total number, was received from those responding as individuals.** There were 91 responses from professionals/ organisations and these respondents were able to base their views on their professional and/or personal experience and insight into the issues.

The professional/ organisational respondents were grouped into broad categories as shown in table 4.1. As the table shows, the largest number of organisational responses was received from local authorities – 20 responses were received in this category, constituting 22% of the total number of organisations and 12% of the total number of responses. A proportionately large number of organisational responses (16) were received from the packaging industry.

#### Gaps in respondent type

A scan of the respondent list along with a review of the respondent organisations revealed no obvious gaps, although the 2 types of organisation least well represented were political parties and consumer groups.

#### Content of responses

Seventy-six respondents provided comments on all or most of the sections of the consultation document; the remainder limited their responses to one or two questions.

A standard letter campaign produced 37 identical responses to question 19. This question, along with question 20, deals with the use of plastic bags. Further examples of standard letters, although these had been customized, covered questions 19 and 20 and in total 86 responses, constituting just over half of all responses, commented solely on plastic bag issues.

The single response from a political party gave a comprehensive response on the subject of the zero waste approach. This response is detailed alongside other answers to question 42 which covers alternative actions to prevent waste.

**Table 4.1**  
**Respondent profile**

<b>Respondent Type</b>	<b>Number of respondents</b>	<b>Percentage of respondents (%)</b>	<b>Respondents – plastic bags issue only</b>	<b>Respondents – other questions</b>
Academic / professional	3	2	-	3
Community council	9	5	-	9
Community sector	11	6	-	11
Consumer	1	1	1	-
Local authority	20	12	-	20
Manufacturer	8	5	1	7
Other public body / publicly-funded body	3	2	-	3
Packaging	16	9	10	6
Political party	1	1	-	1
Environment NGO	2	1	-	2
Retailer	8	5	4	4
Service industry	9	5	6	3
<b>Sub-total Organisations</b>	<b>91</b>	<b>54</b>	<b>22</b>	<b>69</b>
Individual	79	46	64	15
		figures are rounded		
<b>TOTAL</b>	<b>170</b>	<b>100</b>	<b>86</b>	<b>84</b>

## CHAPTER 5: PRODUCT DESIGN AND MANUFACTURERS

Reducing waste at a product design or manufacturing level reduces the amount of raw materials used and can help reduce the amount of waste generated at the end of the process. In turn, this helps to reduce costs. The Design Council noted that “*more than 80% of all product-related environmental impacts are determined by product design.*” While a number of steps – such as WRAP’s<sup>1</sup> Retail Initiative or Envirowise’s designtrack scheme<sup>2</sup> - have already been introduced in order to minimise waste from products and packaging, there are still products being designed that are disposable for health, marketing, convenience or other reasons.

Among responding organisations it is likely that those from the manufacturer and packaging sub-groups would be most involved in any actions discussed in this chapter and so, where appropriate, their views are reported alongside those of the other respondents.

### 5.1 THE DESIGN OF PRODUCTS

The first section of the consultation document focused on what, if anything, could be done in Scotland to reduce waste at the design and manufacturing stage. This might be a difficult area in which to create any impact as most products bought in Scotland are produced elsewhere. So, many of the actions at this level will be at an International, EU or UK level rather than at a Scottish level.

The consultation asked “*Do consultees consider that the Scottish Executive, SEPA and the Enterprise Networks, or other bodies sponsored by the Executive, such as Envirowise, should do more to promote eco-design in Scotland?*” Five options were suggested as possible means of promotion:

- *Option 1: Sponsoring research.*
- *Option 2: Organising competitions for eco-designers.*
- *Option 3: Working more closely with the Design Council and the Design Business Association*
- *Option 4: Establishing a Scottish ecodesign initiative, which could include a campaign to influence product designers in Scotland, an award, a ‘waste charter’ for designers, design guidelines and training?*
- *Option 5: Working more closely with professional institutions (e.g. the Royal Incorporation of Architects in Scotland or the Institution of Civil Engineers) and academic institutions on the mainstreaming of sustainability in academic courses and training that impact on design.*

In total, fifty-seven respondents commented at this question, with **17 respondents in favour of trying all of the options suggested.**

*“Yes - this can only be beneficial although the impact on the waste stream may be small if this is only progressed in Scotland. Foreign manufacturers*

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<sup>1</sup> Waste & Resources Action Programme – more information can be obtained from [http://www.wrap.org.uk/waste\\_minimisation/retailer\\_initiative\\_innovation\\_fund/index.html](http://www.wrap.org.uk/waste_minimisation/retailer_initiative_innovation_fund/index.html)

<sup>2</sup> More information can be obtained from <http://www.envirowise.gov.uk/envirowisev3.nsf/key/designtrack>

*could be encouraged to design products that can be recycled in Scotland with no disadvantage, e.g. to avoid excess of green glass from wine and beer bottles.”*

Local authority

The option of working more closely with professional institutions was chosen by 13 respondents and 11 were in favour of a Scottish eco-design initiative. Working more closely with the Design Council and the Design Business Association was supported by 6 respondents, while 5 favoured sponsoring research, although 1 respondent felt that any research should be specific to Scotland to avoid duplication and increase relevance. The least favoured option was that of organising competitions for eco-designers and only 3 respondents chose this option.

Responses from the manufacturer and packaging sub-groups did not show majority support for any of the options; neither groups showed any support for competitions for eco-designers.

The following table shows the spread of support for each of the options by different respondent categories. Some respondents did not state a preference while others chose more than one option.

**Table 5.1**  
**Preference for options given at question 1**

	<b>Option 1 Sponsor research</b>	<b>Option 2 Competitions</b>	<b>Option 3 Design Council</b>	<b>Option 4 Eco-design initiative</b>	<b>Option 5 Professional Institutions</b>	<b>All of the Options</b>
Academic / Professional	1	-	-	1	1	2
Community council	2	2	1	1	1	-
Community sector	-	-	-	-	1	5
Consumer	-	-	-	-	-	-
Local authority	-	1	2	2	5	6
Manufacturer	1	-	1	2	-	-
Other public body / publicly-funded body	-	-	-	1	-	1
Packaging	-	-	2	-	2	1
Political party	-	-	-	-	-	-
Environment NGO	-	-	-	-	1	1
Retailer	-	-	-	-	-	-
Service industry	-	-	-	-	-	-
Individual	1	-	-	4	3	1
<b>TOTAL</b>	<b>5</b>	<b>3</b>	<b>6</b>	<b>11</b>	<b>14</b>	<b>17</b>

While a number of respondents provided their views on each of the options provided in the consultation paper, a number also made further comments on ways in which to deal with promotion of eco-design in Scotland.

Nine respondents commented on the **need to promote or support new or existing eco-design strategies**, while 8 respondents commented on the **need for an increase in consumer awareness of their buying power or ability to drive change**.

*“If consumers are willing to use their buying power in a smart, environmentally friendly way then this will stimulate companies to improve the design of their product.”*

Local authority

A further 8 respondents wanted to see **eco-design promoted at all stages of education**. Participants at the consultation event also commented on the role of education suggesting that eco-design be encouraged in design courses.

Only 3 respondents felt that nothing should be done or that this should not be a function of government.

There was some recognition of the international nature of eco-design, with 7 respondents commenting that **eco-design was already happening in Scotland and that imports posed more of a problem**.

However, there was a concern, voiced by 7 respondents, that **initiatives may not be implemented unless there was a proven cost benefit** and 6 respondents felt that **legislation would be needed**. One suggestion to help overcome this (from 4 respondents) was that there should be **some form of financial or other reward for existing practitioners** in the field.

Six respondents wanted to see **Scotland becoming a leader in the field and perhaps establishing an expert knowledge base**. That said, the need to involve other countries was also cited by six respondents who felt that there should be **research or links into initiatives in other countries**. A further 3 respondents mentioned the **need to evaluate existing initiatives in the UK or Scotland**.

The need to **mainstream eco-design** was mentioned by 5 respondents while 3 mentioned the need for sustainability; in all sectors and in the long term.

Other comments, each made by a small number of respondents included:

- possible use of penalties for non-compliance (2 respondents);
- whichever option is cost effective or practicable (2 respondents);
- the money could be better used elsewhere (2 respondents);
- the need for UK or EU standard labelling (1 respondent);
- the feeling that ecodesign is an unattractive term – suggestion of “efficient design” instead (1 respondent);
- that the need for eco-design be a requirement in procurement policy for government or the public sector (1 respondent).

There were suggestions from some attending consultation events that there is untapped potential in universities/ further education colleges to look at eco design in relation to product design and innovation and / or to encourage eco-design principles in design courses. Additionally, some individuals noted that Design for Deconstruction concepts should be built into building standards.

## 5.2 WASTE PROFILES

While in theory, waste profiles could be generated for each product, in reality, this is not an easy process due to the variety of elements – such as life-cycle analysis – that can impact on a waste profile. However, if they can be designed, there are a number of benefits to waste profiles and they can be used to:

- Set targets (mandatory / voluntary);
- Benchmark – against other similar products;
- Certify or kitemark products;
- Establish differential rates of taxation;
- Provide consumer information / labelling to inform purchasing decisions.

Question 2 of the consultation paper asked “*Should the Scottish Executive and SEPA carry out further work on “waste profiles” of products? If so, what?*” Options included:

- *Option 1: Sponsoring work in Scotland to outline “waste profiles” of products.*
- *Option 2: Sponsoring work in Scotland on “environmental profiles” of products. (“Environmental profiles” would consider environmental issues generally, not just waste). The ISO 14020 family of standards could offer an internationally agreed template for this work.*
- *Option 3: Working with other Government Departments across the UK on either “waste profiles” or “environmental profiles.”*
- *Option 4: Working with the British Standards Institution, and EU Standards bodies, to ensure that waste, or sustainability generally, forms part of the development of technical product standards.*

There were 62 responses to this question; **18 supported the option of working with the British Standards Institute and EU Standards bodies**. Half (3) of those responding at this question from the packaging sub-group supported this option, as did 7 of the local authorities. The manufacturing sub-group showed no majority preference.

*“To ensure consistency and to acknowledge the limited size of the Scottish manufacturing base, this needs to be undertaken at the national (BSI) and international (EU) level.”*

Community Sector

**Sponsoring work in Scotland on “environmental” profiles** attracted support from 10 respondents while 10 others felt that **working with other Government Departments** was the preferred option. As one respondent from the Academic / Professional sub-group commented,

*“It may be more practical to work with other UK departments on areas such as lifecycle analysis in order to develop a more forward thinking approach, across the UK, to ensure minimum product standards in relation to waste. However, if this is not possible then Scotland should make the first steps towards developing waste profiles as again this helps Scotland to become leaders in the field.”*

One third (3) of the community councils responding to question 2 supported the option of working with other Government Departments and only 2 respondents voiced support for sponsoring work in Scotland on waste profiles.

**Nine respondents felt that all of the suggested options had merit;** this figure includes half (3) of the community sector sub-group responding to question 2.

The following table shows the spread of support for each of the options by different respondent categories.

**Table 5.2**  
**Preference for options given at question 2**

	<b>Option 1 Waste profiles</b>	<b>Option 2 Environmental profiles</b>	<b>Option 3 Working with Government</b>	<b>Option 4 BSI / EU Standards</b>	<b>All of the Options</b>
Academic / Professional	1	2	2	-	-
Community council	-	-	3	1	-
Community sector	-	2	-	1	3
Consumer	-	-	-	-	-
Local authority	-	2	-	7	2
Manufacturer	-	-	1	-	1
Other public body / publicly-funded body	-	1	-	1	1
Packaging	1	1	-	3	1
Political party		-	-	-	-
Environment NGO	-	-	1	-	-
Retailer	-	-	-	-	-
Service industry	-	-	-	1	1
Individual	-	2	4	4	-
<b>TOTAL</b>	<b>2</b>	<b>10</b>	<b>11</b>	<b>18</b>	<b>9</b>

Some respondents did not state a preference while others chose more than one option.

Ten respondents agreed with the view expressed in the consultation document that product specific waste profiles may be difficult to achieve.

The need to **present information on product profiles in a simple, accessible manner in order to engage or educate consumers** was mentioned by 8 respondents, while 3 others felt that awareness should be raised within the business community with businesses taking a lead in this field. Four respondents wanted to see a **standard labelling system or kitemark**.

Five respondents felt that the Scottish Executive or SEPA **should not carry out work in this area** and a further 3 felt it should be carried out by manufacturers and producers.

**Learning from examples of best practice in other countries** was important to 3 respondents, while another 3 felt that research should centre around overall product design or include the whole life-cycle of the product. Three respondents stressed that any findings from research in this field must be implemented.

Again, there were a variety of comments made by 2 or less respondents and these included:

- The need to target products with the greatest impact on the environment (2 respondents);
- A view that waste profiling would be a costly exercise (2 respondents);
- That research should focus on processes rather than products (2 respondents);
- The need to build on existing standards (1 respondents);
- The need for a packaging regulatory body (1 respondent).

### 5.3 PRODUCT LIFE-SPAN

At every stage of a product's life-span; from manufacture to disposal; there will be an opportunity to reduce waste. Longer lasting products can mean less waste. However any positive impact they may have on reducing waste levels through being discarded less frequently, needs to be balanced against the fact that some older products can use more energy than their newer versions.

The consultation document asked “*do consultees consider that the Scottish Executive should take further action in relation to the life-span of products? If so, what?*” Options included:

- *(Option 1): Funding research in Scotland.*
- *(Option 2): Supporting research being carried out across the UK.*
- *(Option 3): Providing better information to consumers, at either Scottish or UK level, on estimated life-spans of products.*
- *(Option 4): Concentrating work on specific products (e.g. washing machines, cookers, electrical goods generally)*
- *(Option 5): Providing more support to companies making long-life products to an accredited standard, or to repair and refurbishment shops.*
- *(Option 6): Investigating ways to require longer product guarantees, and improve availability of spare parts. This work would need to be undertaken at a UK level as consumer protection is a reserved matter.*

Sixty-two respondents commented on product life-span **with 19 supporting the provision of better information to consumers**. A respondent from the community sector commented “*Information to consumers on estimated life span, empowers consumer choice.*”

**The option of providing more support to companies making long-life products was preferred by 19 respondents**. Again, while there was no majority preference, 3 out of the 8 responding at this question from the manufacturer and packaging sub groups felt that the Scottish Executive or SEPA should not be involved in this area; six other respondents agreed with this view.

Almost a quarter (**15**) of respondents felt that the Scottish Executive should investigate ways to require longer product guarantees, and improve availability of spare parts while **10 supported the option of concentrating work on specific products**.

The options which attracted least support were those of funding research in Scotland, which was only supported by 4 respondents, or supporting research across the UK which was supported by 2 respondents.

Only four respondents felt that all of the options should be considered; some respondents did not state a preference while others chose more than one option.

Table 5.3 shows the spread of support for each of the options by different respondent categories.

**Table 5.3**  
**Preference for options given at question 3**

	<b>Option 1 Funding research</b>	<b>Option 2 Supporting research</b>	<b>Option 3 Info for consumers</b>	<b>Option 4 Specific products</b>	<b>Option 5 Supporting Companies</b>	<b>Option 6 Product guarantees</b>
Academic / Professional	2	-	2	1	1	2
Community council	-	1	3	1	1	1
Community sector	1	-	3	3	6	1
Consumer	-	-	-	-	-	-
Local authority	1	1	6	2	6	6
Manufacturer	-	-	1	-	-	-
Other public body / publicly-funded body	-	-	-	1	-	-
Packaging	-	-	-	1	-	-
Political party	-	-	-	-	-	-
Environment NGO	-	-	-	-	-	-
Retailer	-	-	-	-	-	-
Service industry	-	-	-	-	-	-
Individual	-	-	4	1	5	5
<b>TOTAL</b>	<b>4</b>	<b>2</b>	<b>19</b>	<b>10</b>	<b>19</b>	<b>15</b>

Thirteen respondents, including 6 local authorities, felt that **retailers also had a role to play** in relation to product life-cycles; perhaps in their role as stockists of spare parts. The need for a **sea-change in the marketing and advertising of products** was seen as necessary by 9 respondents who felt that these should not be allowed to promote change for change's sake; similarly at the consultation event, participants saw the need for anti-advertising to tackle peer pressure. As one individual noted *“Product marketing depends on creating dissatisfaction with the old and a wish for a change/something new.”* Seven respondents wanted to see good practice supported or promoted throughout business and suggested the need for business networks.

**Repairing and recycling issues** were raised. Eleven respondents wanted to see these options encouraged; perhaps becoming cheaper or VAT free, one local authority commented that *“Research into and advertising that goods last longer, cheaper repairs, availability of spare parts, cost of spare parts could perhaps be done by a body such as REMADE”* Nine respondents wanted manufacturers to ensure that **product components could be retrieved, reconditioned and reused** wherever possible. Comments from the consultation event suggested the need to look at take-back schemes for repair or recycling of component parts;

participants also raised the possibility of differential VAT scales related to the life-span of a product.

The **provision of information to allow consumers to make informed choices** was raised by 6 respondents and another 6 respondents wanted to see easily understood information on the environmental effects of short life products. Four respondents commented that information should be freely available to all who wanted it, while 2 saw the need for a central point of information perhaps provided via the internet.

Regulation for imported goods with short shelf lives was suggested by 3 respondents. However, two respondents commented that, in some cases, shorter life products can be more environmentally friendly than more durable versions.

One other point raised at the consultation event suggested that waste prevention actions should be concentrated on products with longer life-spans.

Other suggestions included:

- Looking at ways to work with the EU, or follow approaches taken by the EU or the UN Environment Programme;
- Forming links with DEFRA's Market Transformation Programme (2 respondents);
- The need for a mechanism to update product information (2 respondents);
- The view that product life-span should be decided by market forces (2 respondents);
- The need to make durable goods less expensive for consumers (2 respondents);
- The need for any action taken to be practical and cost effective (1 respondent);
- The need for any action to be generic rather than product specific (1 respondent).

#### **5.4 DISPOSABLE PRODUCTS**

There has been a marked growth in the number of disposable, or single-use, products available to consumers. While some of these products are necessarily disposable; for sanitary or security reasons; others are produced for convenience, economy or fashion. On the whole, disposable products are, initially, less expensive than their reusable counterparts; but when viewed over a longer term, longer-life products can produce savings.

Possible measures to reduce waste from disposable products include placing responsibility on manufacturers. However this would require to be done within existing legislation or, in the case of a levy, through primary legislation. The consultation document acknowledges that implementation would be problematic; deciding which products to target or overcoming procedural difficulties.

Question 4 asked: *Bearing in mind that some products are always likely to be disposable, do consultees consider any action should be taken at EU, UK or Scottish level to minimise waste from disposable products? If so, what? Possible actions could include:*

- *(Option 1): Voluntary agreements with manufacturers to minimise waste from disposable products (e.g. by reducing the size of such products or by only using disposable versions of the products where essential)*
- *(Option 2): Design for recycling.*

- *(Option 3): The introduction of producer responsibility legislation for disposable products.*
- *(Option 4): A levy on disposable products. This would require primary legislation, would take a number of years and could be disproportionate.”*

As table 5.4 shows, there **was a degree of support for producer responsibility legislation from both the community sector and local authorities.** Overall, 24 out of the 66 respondents to question 4 favoured this option.

*“Voluntary agreements tend to deliver much lower success rates than mandatory ones. Producer responsibility legislation or a levy on disposable products would be much more effective at achieving change.”*

Environment NGO

**Voluntary agreements** were supported by 14 respondents as was the option of **design for recycling.**

Six respondents, 4 of whom were local authorities, wanted to see **a levy on disposable products** with one local authority favouring a high level of taxation. Nine respondents felt that the levy should only apply if items were non-recyclable, perhaps with a sliding scale depending on the recyclability of component parts, or if there was a recyclable alternative. Two respondents, however, felt that there should be no levy on disposable products that have been specifically designed to be recycled and 5 respondents would like to see incentives offered to producers who minimise non-recyclable waste from their products.

**Exemptions** were suggested by 5 respondents who stressed that these should apply to **medical supplies** or to products where health and safety or hygiene issues apply.

Two respondents felt that **all of the options had merit** while 6 respondents felt that **no action should be taken**; some respondents did not state a preference while others chose more than one option.

Again, there was no consensus of option within the manufacturer or packaging sub groups.

**Table 5.4**  
**Preference for options given at question 4**

	<b>Option 1 Voluntary agreements</b>	<b>Option 2 Design for recycling</b>	<b>Option 3 Producer responsibility legislation</b>	<b>Option 4 Levy on disposable products</b>
Academic / Professional	1	-	-	-
Community council	1	4	1	-
Community sector	3	2	7	-
Consumer	-	-	-	-
Local authority	4	4	7	4
Manufacturer	1	2	1	-
Other public body / publicly-funded body	1	-	1	1
Packaging	1	-	1	-
Political party	-	-	-	-
Environment NGO	-	-	1	1
Retailer	-	-	-	-
Service industry	-	-	-	-
Individual	2	2	5	-
<b>TOTAL</b>	<b>14</b>	<b>14</b>	<b>24</b>	<b>6</b>

Many disposable products used in Scotland are imported from abroad; consequently any action on these products would need to be taken outside Scotland and, perhaps not surprisingly, 10 respondents felt that it was more appropriate for EU directives to address this issue and ensure consistency across Europe. That said, 3 respondents requested best practice guidance and this should include examples from outside Scotland.

The need to engage, educate or inform consumers was mentioned by 10 respondents with a further 7 suggesting this be done through labelling on disposable products.

A small number of respondents suggested specific items or ranges which, they felt, should be targeted and these included disposable nappies (mentioned by 2 respondents), fashionable frames for glasses and disposable cameras (each mentioned by 1 respondent).

Other suggestions made by small numbers of respondents included:

- The need for a robust definition of disposable products (2 respondents);
- Further research into bio-degradable materials to use in disposable products (2 respondents);
- The need to promote the use of bio-degradable materials (2 respondents);
- The use of deposit and return schemes for disposable items (2 respondents);
- A query over how any legislation would be enforced, and who would enforce it (2 respondents);
- A concern that the suggested actions may affect competitiveness (1 respondent).

At the focus groups, discussion on disposable lifestyles produced comments that marketing campaigns increase awareness of, and desire for, convenience products, and a feeling that it is cheaper to buy new than to repair. Only one focus group member raised non disposable

products unprompted (non disposable nappies) as a mechanism to reduce household waste. When prompted further, one respondent noted that they could buy non disposable razors as an alternative to disposables.

Individuals attending the consultation events noted that electronic products are evolving very quickly and are driven by a constant drive for smaller and more innovative items such as mobile phones. There were suggestions that waste prevention should be focused on products that do not advance quickly in technology, rather than products with a short life span.

## 5.5 INTEGRATED PRODUCT POLICY

Integrated Product Policy (IPP) examines the full life-cycle of a product in order to identify areas where environmental impact can be minimised. Although it may be more suitable to run IPP projects at a UK or EU level, it may be feasible to run IPP pilot projects in Scotland if Scottish-based companies are keen to demonstrate their environmental credentials.

The consultation asked “*would it be desirable and/or feasible to run an Integrated Product Policy pilot in Scotland? If so, for which product(s)? Would any Scottish-based companies wish to run an IPP project in Scotland?*”

While 20 of the 48 respondents commenting at question 5 felt that **the viability of Scottish based projects should be investigated**, 9 respondents felt that it was more applicable at UK or EU level and 4 wanted to see the results from the EU pilots before commenting. One public body/ publicly-funded body suggested that,

*“the viability of an “Integrated Product Policy” pilot programme be investigated. By the nature of its approach, IPP will require greater communication and co-operation with designers, industry, marketing, retailers and consumers. Again this has the potential to lead to new business developments and ideas. It may also offer some Scottish businesses a marketing advantage for their products.”*

Six respondents wanted **research on the role of IPP in a wider context** with 1 mentioning the need to address how it would interact with other directives such as WEEE. Four of the 5 packaging companies who commented at question 5, mentioned IPP in an European context, as did 3 of the 5 manufacturers.

**Five respondents did not feel that pilots should be run in Scotland** and a further 3 commented that the manufacturing base was too small or that it was unlikely that Scottish businesses would participate. Two manufacturers, however, felt that multi-nationals with a Scottish base might. The possibility of using incentives to encourage participation was raised by 1 respondent.

The possibility of running pilots on Scottish products such as whisky was raised by 3 respondents, although 1 respondent felt that there should be measures to ensure IPP does not distort the global competitiveness of Scottish companies. Conversely another respondent felt it may offer a market advantage to participants. One respondent expressed the view that an IPP would not be suitable for food or drink products.

A variety of suggestions were made as to possible suitable products or companies for an IPP pilot and these included:

- Drink cartons (2 respondents);
- Paper (2 respondents);
- Electronics (1 respondent);
- Food and drink (1 respondent);
- Toys (1 respondent);
- Furniture (1 respondent);
- Mobile phones (1 respondent);
- Tesco (1 respondent).

In summary,

- There was broad agreement for the need to promote eco-design in Scotland, although preferences for the best way to achieve this varied.
- There was also support for carrying out further work on the waste profiles of products, although views varied over which organisations should be involved in working on this. The highest level of support was for working with other government departments across the UK on either waste profiles or environmental profiles.
- In terms of product life span specifically, a need was defined for providing better information to consumers and providing more support to companies. There were also suggestions for changes to marketing materials to help encourage consumers to move away from a “disposable” lifestyle to one based on repair and recycling.
- For disposable products specifically, highest levels of support were for the introduction of producer responsibility legislation for disposable products.

A key theme emerging across all these issues was a need for campaigns to raise awareness of these issues or for education campaigns to help encourage better understanding of issues in relation to product design. Responses pointed to the need for a wide range of different bodies and organisations to work together on product design. The international nature of many of these issues was highlighted, with suggestions that some of these should be dealt with at a UK or EU level.

## CHAPTER 6: RETAILERS

The retail sector in Scotland employs roughly 10% of the workforce with a turnover in 2002 of around £19 billion. It plays a significant role within the UK economy in relation to waste prevention. There are benefits to retailers in reducing the waste associated with the products they sell and, in recent years, cost considerations have led to increased efforts on the part of retailers to recycle “back of store” packaging.

However, the cost of front-of-store waste sits with local authorities (and ultimately the tax payer), albeit that excessive use of materials in products and packaging will still lead to increased retailer costs. This situation has been recognised and is changing, with retailers working with various WRAP initiatives to tackle consumer waste. For example, there is a current commitment from retailers who have signed up to WRAP’s Courtauld Commitment which is designed to tackle household packaging and food waste.

Eight organisations from the retail sector responded to the consultation. Their views, along with those of respondents from the packaging sub-group, have, where relevant, been reported alongside the responses from other respondents. **There was no response from the consumer sub-group to this section of the consultation.**

### 6.1 PROCUREMENT

Consumer demand affects the purchasing decisions made by retailers and these, in turn, affect manufacturers and distributors. Retailers, therefore, play a pivotal part in the supply chain, giving them substantial influence on product specifications and packaging design.

Question 6 of the consultation document asked *“Do consultees consider that there is a need for guidance and support for retailers to build waste considerations into their procurement process? If yes, what guidance and support would be useful? It may be preferable to take this work forward at a UK, rather than Scottish, level.”*

Twenty-eight of the 55 respondents commenting on this question voiced **agreement with the need for guidance and support**, while 18 felt that the information should be **easily understandable and readily accessible** (this included 2 of the 4 retail organisations commenting at question 6). One public body/ publicly-funded body felt *“There could be benefits if retailers were able to provide waste information about a product at its point of sale.”* The other 2 retailers disagreed that there was a need.

The need for **waste considerations to be built into procurement processes at a UK or EU level** was mentioned by 18 respondents who felt this approach would be more effective. This opinion was voiced by half (3) of the packaging sub-group commenting here.

Eight respondents felt that the **support would have to be provided by experts**, while 7 respondents felt that **existing schemes could be built upon** and that this could include work currently being done by WRAP. A suggestion that **support be provided by trade bodies** was voiced by 5 respondents.

Seven respondents felt **that legislation - rather than guidance - was needed**, with one manufacturer commenting *“Guidance & support is useful; but it needs to be backed up by legislation.”* Five respondents suggested a **non-mandatory code of practice**, perhaps utilising a kitemark or other logo scheme. Two respondents asked that a grading system or other simplified information be provided to procurement teams. Examples of best practice or research from other countries were requested by 4 respondents, while 1 respondent felt that examples of bad practice would be useful.

Some responses to the consultation suggested that the practice of building waste considerations into procurement processes may already be happening with 6 respondents mentioning that some retailers are already building in waste considerations. Four respondents felt there would be more of an impact if large retailers were engaged in this process.

**Educating consumers in order to change purchasing habits**, perhaps through information provided at point of sale, was seen by 5 respondents as being important, while 6 respondents commented that market forces drive the procurement process.

Other comments included:

- The possibility of offering incentives (2 respondents);
- The feeling that this might not be successful with larger companies and that targeting SMEs would be more appropriate (2 respondents);
- That it should be up to the retailer to decide (2 respondents);
- The benefits of highlighting potential savings (1 respondent);
- The problems of obtaining information on products sourced outwith this country (1 respondent).

## 6.2 TRAINING

Staff within retail outlets provide product information to their customers and there are courses for staff on the environmental impact of waste and on waste awareness.

Question 7 of the consultation asked, *“Do consultees consider that retailers and their employees could do with further training, support and guidance on waste issues? If so, what?”*

**Over half (39)** of the 61 respondents answering this question, and 2 of the 4 retail organisations commenting, **voiced agreement with the need for further training**. One community council stated *“Continuous training in any occupation leads to more informed staff and a better service, such training might be more wide spread and available to as many people working within retail as possible.”* Only 8 disagreed with this suggestion on the basis that it may not be well received. Six respondents commented that it may be hard to implement and especially that it may be hard to engage large retailers.

Four respondents felt that the **training should be provided by employers**. Two respondents thought large companies should have staff responsible for delivering training and one commented that major retailers already provide training to their staff. Two respondents felt the training should be aimed at staff in SMEs.

**Generic training was not seen as being of particular use** and 9 respondents felt it would need to be product or sector specific. One manufacturer commented *“However, the training, support and guidance needs to be tailored to suit the audience (not a generic campaign to cover all).”* EU legislation was mentioned by 5 respondents who felt new regulations, or updates to existing legislation, would increase the need for training.

The question of **who should provide the training** was raised by 9 respondents who felt it should be delivered through existing courses or by existing bodies; one local authority mentioned *“Such training could, perhaps, be delivered by existing providers (eg EnviroWise).”* There was a suggestion that courses could lead to a basic standard or certificate and 7 respondents commented specifically on the need for some sort of standard or charter mark. Six respondents voiced the opinion that sources of advice are already available and that these should be assessed and promoted.

Retailers already provide product information to customers and 9 respondents felt that this should be extended to providing **information on waste or recycling**.

Training for sales staff was not seen as necessary by 3 respondents. The need to include voluntary staff, however, was mentioned by 2 respondents and 3 respondents noted that staff may need incentives to participate in training.

Including manufacturers in any training programmes was seen as important by 3 respondents.

A range of issues were seen as possible subjects for training and these included:

- Sustainability and waste awareness (5 respondents);
- Training on all aspects of waste (4 respondents);
- Health and safety training – including storage and handling (3 respondents);
- Waste segregation (1 respondent).

## **6.3 FOOD WASTE**

### **6.3.1 Labelling**

There are a variety of different dates printed on food labels. Some dates are important for consumers in relation to food safety while others provide information to retail staff. The consultation asked *“Do consultees consider that food labelling requirements cause any conflicts with waste prevention? Is so, what are these conflicts and what can be done to reduce them?”*

Fifty respondents commented at question 8. Of these, **15 felt that there were no conflicts**.

Fifteen respondents stressed that, whatever action was taken on this issue, **health and hygiene issues should be paramount**. Three of the 4 respondents from the packaging subgroup voiced this opinion. As one local authority noted *“The Council view is that while there is merit in minimising food labelling, in any situation where there is a conflict between food labelling and waste prevention, the former must take priority in terms of public health protection.”*

There was acknowledgement, from 13 respondents, that there is confusion over the various dates that can be printed on labels and some suggestions were made as to how this could be remedied:

- Consistent use of “use by”, “use within” dates (4 respondents);
- More consistent use of “best before” dates (3 respondents);
- Use a code or other non-date identification of shelf-life for staff (3 respondents);
- Use food indicator labels (1 respondent).

*“The food labels (sell by/ use by/best before) can be quite confusing for members of the public and undoubtedly leads to food wastage in both the retail outlets and in the home. Consideration should be given to the use of ‘hidden coding to avoid unnecessary food wastage.”*

Service Industry

Three respondents felt there were excessive information requirements and saw merit in simplifying or reducing these, with 1 respondent noting that more information requires more packaging. However, 2 respondents saw the need for environmental impact information to be provided on labels.

The possibility of **information being provided in-store rather than on labelling** was raised by 6 respondents and 2 others felt this should include advice on safe storage or refrigeration.

While 3 respondents felt that retailers use labelling to manage food waste, 3 respondents felt that “sell by” dates are, or may be, set early to increase the amount of product sold.

### **6.3.2 Surplus food - retailers**

Retailers can be left with a surplus of food products near or at the end of their shelf-life. FareShare collects quality surplus food from wholesalers, retailers and caterers and distributes this to projects helping the homeless or disadvantaged that are registered. Question 9 of the consultation asked, *“Do consultees consider that more could be done to collect and use surplus food from wholesalers, retailers, caterers and other outlets? If so, what?”*

Almost half (21) of the 45 respondents commenting on question 9 voiced agreement that more could be done. Only 1 respondent, a community council, disagreed.

Fifteen respondents wanted to see **useable food collected and distributed through charities or voluntary organisations** and a further 12 respondents wanted to see FareShare or other similar schemes more widely promoted. One retailer commented on their practice *“Yes. In order to minimise food wastage, the respondent sells unsold food products to our employees at a discounted price, use some in our own catering and donates to charities such as FareShare (all food is still within its use-by date). The Scottish Executive could consider ways of promoting and supporting the activities of groups such as FareShare.”* However, 2 respondents commented on the costs involved. Three respondents would like to see legislation to ensure collection of surplus food and 1 respondent felt retailers may need incentives to participate. The need for retailers and organisations to work together was voiced by 4 respondents.

Five respondents noted that smarter procurement practices would lead to less waste. One respondent felt there should be financial penalties for over-stocking. Two respondents suggested that discounted prices for employees could remove some of the surplus food.

Health and safety issues surrounding food waste were mentioned as paramount by 3 respondents.

Possible problems highlighted included the **practicalities of collecting the surplus** (mentioned by 5 respondents) and **problems caused by the Animal By-products regulations** (also mentioned by 5 respondents).

**Composting was seen, by 13 respondents, as the ideal way to dispose of unusable food** and 4 respondents saw a role for community recycling groups in the collection and processing of this waste. One respondent saw a role for SEPA in actively encouraging the collection and treatment of surplus food.

Two respondents felt more information was needed as to the amount of surplus food being landfilled and to identify which stage produces most waste.

### **6.3.3 Surplus food – consumers**

For a variety of reasons, consumers may be left with a surplus of food in the home and this waste is normally thrown away. Question 10 of the consultation asked, *“Do consultees consider that action should be taken to reduce food waste in the home? If yes, what action should be taken? One possibility might be to produce guidelines on retail promotions and their waste implications. Legislation in this area might be timeconsuming, disproportionate and, in any event, more suitable at UK rather than Scottish level. Another option could be increased use of re-sealable packaging, to help food keep fresh for longer.”*

Fifty-seven respondents commented at question 10 and the majority (32) saw **the need to educate consumers on a variety of issues** including food preparation, nutrition and storage as well as waste awareness. This could include; clearer guidance on “use by” and other dates (mentioned by 3 respondents), implementation of toolkits to reduce household waste (1 respondent), publicising Wastewatch (1 respondent), encouraging purchases of fresh food (3 respondents) and health and safety issues (1 respondent).

*“Encouragement of using home storage (but not disposable cling film!) that seals, and information on the best way to keep different food fresh (temperatures, light/dark etc) would be more useful.”*

Individual

Five respondents saw the need for **more responsibility to be placed with consumers** and 1 respondent suggested a charge for household waste collections. **Home composting** was seen as a possible solution and 6 respondents felt this should be promoted.

Retailers use a variety of promotional tools including “buy one, get one free offers” and 14 respondents felt that **these contributed to household waste and that they could be restricted** or replaced with half price offers for single items. Seven respondents, including 3 retailers, felt that retailers should decide their sales policies and there should be no action on these offers. Three respondents commented that there was insufficient evidence to suggest

that “buy one, get one free” offers do increase waste. Three respondents mentioned that it is not in the interests of retailers to undertake irresponsible promotions. Two respondents felt action would be more suitable at a UK level.

The possibility of producing guidelines for retailers on the waste implications of promotions was raised by 4 respondents. Four respondents mentioned the need to reduce multi-packaging and 2 respondents felt retailers should be provided with information on shopping patterns or small-household purchasing. Three respondents would like to see unpackaged goods more widely available while 2 respondents saw the need for a faster supply chain to increase availability of fresh food.

**Research, including that carried out by WRAP, to provide greater understanding of why food is wasted in the home** was mentioned by 7 respondents.

Packaging issues were covered in relation to household food waste, with 5 respondents wishing to see an increase in the use of re-sealable packaging. However, the same number of respondents felt that re-sealable bags are not required as they are expensive or bulky.

Some individuals attending the consultation event noted that “buy one, get one free offers” (BOGOF) often generate waste, especially products with fresh or short sell-buy dates with lifestyle choices being driven by value. There were suggestions for this to be identified as an effective area to educate consumers, with a recommendation to consumers to purchase BOGOF offers for dried or canned foods only. Some individuals suggested that retailers should be encouraged to use food indicators instead of use-buy dates and noted that these are popular in the US. It was also noted that school and home economics should cover wastage of food and discourage the use of ready meals and other over-packaged items.

It was also noted that retailers could do much more to highlight packaging issues in their stores and suggestions were for:

- Minimal packaged areas in the store (similar to organic foods);
- Convince retailers that innovations in packaging will get customer loyalty (example of a lettuce growing live in the packaging);
- Encourage the use of farmers markets inside stores.

Attendees at focus groups also raised concern over the number of promotions that encouraged the consumer to buy more than they required. For example “2 for 1” or “buy one, get one half price” offers were deemed responsible for more waste being generated.

## **6.4 PACKAGING**

### **The Packaging (Essential Requirements) Regulations 2003**

Producers and manufacturers are required by the Packaging (Essential Requirements) Regulations 2003 to minimise the amount of packaging on their products. The regulations are enforced by Local Authority Trading Standards officers, although the consultation document acknowledges that there have been no prosecutions in Scotland under these regulations. The consultation asked “*Do you think the Packaging (Essential Requirements) Regulations 2003 are working? If not, why not? What action could be taken to improve their operation?*”

**Twenty-one of the 54 respondents commenting on question 11 felt that the Packaging (Essential Requirements) Regulations 2003 are not working** and the main reason given for this view was **a perception of over-packaging** (especially at Easter and Christmas). Seventeen respondents commented that they felt this was still widespread.

The **lack of prosecutions** mentioned in the consultation document was echoed by 16 respondents who felt that this indicated the regulations were not being enforced and 9 respondents called for more resources or support for enforcement. A further 8 respondents felt consistent enforcement should happen at EU level or even globally.

There was a general feeling of a **lack of awareness about the existence or substance of the regulations** (cited by 14 respondents). Comments on the substance of the regulations were that there are many areas which remain unclear, with 9 respondents suggesting that there were a number of **grey areas causing confusion in the wording or intent**. Specific wording was mentioned with 4 respondents commenting that “placing” was likely to happen outwith the UK’. Four respondents felt problems were caused by the use of the words “extensive packaging” and felt this should be clarified. Two respondents felt there was confusion over performance criteria and 3 respondents felt that the time limits given in the regulations were too long. One local authority stated *“there are difficulties in the enforcement of the Regulations due to their drafting. Two main issues are placing on the market’ and time limits.”*

The use of penalties in enforcement was raised by 7 respondents, while 6 felt that an alternative regulator may be needed. There were 3 comments on the problems faced by local authorities in “taking on” multi-national companies; one Environment NGO commented *“it is pretty improbable that a local authority is going make much headway in a legal challenge against big businesses like the supermarkets”*.

The need for responsibility to be placed with retailers and manufacturers was stressed by 5 respondents, although 3 respondents were concerned that some products may be unfairly penalised, for example where packaging extends shelf-life.

**Research** into packaging or consumer perceptions of packaging was identified as important by 6 respondents and 2 others felt that we could learn from systems operating overseas. **All 3 of the retailers commenting at this question saw the need for research.**

Some respondents, however, **felt that the regulations were working** and 14 respondents were happy with the current system. **This included 4 of the 6 respondents from the packaging sub-group** who commented at this question.

#### **6.4.1 Minimising household waste from packaging**

Alongside The Packaging (Essential Requirements) Regulations 2003, both WRAP and The Industry Council for Packaging and the Environment (INCPEN) are conducting non-statutory work on minimising waste, or the environmental impact of waste, from packaging. Schemes aimed at minimising waste from packaging include refill packs or containers; similar systems are currently in use in Europe and North America.

Question 12 asked, “Could any further action be taken in Scotland to minimise household waste from packaging? If so, what? Options could include:

- (Option 1): Better information for consumers on the role packaging plays, how its environmental impact can be minimised, and what action they can take. This may be a role for Environment Direct.
- (Option 2): Better information for consumers on how much of the retail price of a product relates to the packaging, rather than the product. Again, this may be a role for Environment Direct.
- (Option 3): More work to mainstream product refill systems in Scotland (eg a feasibility study)?”

As shown in table 6.3, there was broad support for **all of the options** mentioned in the consultation document with **19 out of the 59 commenting supporting these actions**. Smaller numbers of those commenting referred to option 3 specifically (13 respondents), option 1 specifically (11 respondents) or option 2 specifically (10 respondents).

Some respondents did not state a preference while others chose more than one option.

**Table 6.1**  
**Preference for options given at question 12**

	<b>Option 1 Information on role of packaging</b>	<b>Option 2 Information on cost of packaging</b>	<b>Option 3 Product refill systems</b>	<b>All of the Options</b>
Academic / Professional	-	-	-	2
Community council	1	3	2	2
Community sector	-	-	1	3
Consumer	-	-	-	-
Local authority	3	4	3	7
Manufacturer	2	1	1	2
Other public body / publicly-funded body	-	-	1	-
Packaging	2	2	1	1
Political party	-	-	-	-
Environment NGO	-	-	-	-
Retailer	1	-	-	-
Service industry	-	-	-	-
Individual	2	-	4	2
<b>TOTAL</b>	<b>11</b>	<b>10</b>	<b>13</b>	<b>19</b>

Other suggestions given by those responding to this question included **the need for penalties or incentives to change behaviour** (7 respondents).

**Packaging standards were identified as important by 6 respondents while 4 respondents** saw the need to extend regulation to retailers and 4 respondents noted that the implementation of the suggested options would need support from major retailers.

An increase in the number of collections schemes and recycling sites was identified by 4 respondents, while 3 felt there was a need for further education on recycling and 3 other respondents felt that the cost of waste should be included on labelling. At the consultation

event, it was suggested that information on recycling be provided in-store and that ‘money off’ vouchers for recycling may be a useful initiative. Trials of this type of scheme are currently underway in England.

Two retailers voiced their opposition to option 2 as they felt this may not be meaningful and they had concerns over accuracy. Two respondents, including 1 retailer, felt that option 3 may be difficult to implement.

*“Refillable systems are not appropriate in the UK as the infrastructure to be able to make it work does not exist unlike in other countries. The reliance on importing of products also makes this concept impractical. (Work has already taken place by the Advisory Committee on Packaging on returnable systems)”*

Packaging

There were a number of comments made by smaller numbers of respondents and these included:

- The need to encourage more local suppliers or deliveries (2 respondents);
- Problems with a refill system in relation to the elderly or those without transport (1 respondent);
- A packaging consumer watch-dog (1 respondent);
- Extra charge for packaging (1 respondent);
- Regulations to compel recycling (1 respondent);
- Recycling point in-store (1 respondent);
- Low-cost refill bags (1 respondent);
- Standard container sizes - including those from overseas) (1 respondent).

**Excess packaging was the main theme to emerge from the four focus groups.** In general, attendees felt that waste reduction could be achieved via a reduction in packaging and that manufacturers and retailers should ultimately be responsible for affecting this change. It was also perceived that some supermarkets are already trying to address this issue. Some individuals noted a perception that there is an overuse of plastic and plastic film in packaging and some others noted that retailers could provide in store information on the amount of packaging associated with different products. Some of these individuals noted that they would choose a product with less packaging provided that the quality and cost of the product were comparable and not compromised.

Across the four focus groups it was perceived that buying food from local shops would also reduce the amount of excess packaging purchased. The perception was that if the public used local retailers (including farmers markets) that there were greater opportunities to buy food loose and to buy in bulk, and as a consequence of this there would be a reduction in packaging. However it was also noted that local shops tended to be more expensive and that it was in general more convenient to use supermarkets. A link was also made with healthy eating and waste reduction, several group members felt that people should be encouraged to cook from fresh. It was perceived that people currently were more likely to use ready meals and other convenience foods and, as a direct consequence of this, more waste was generated.

Some of the attendees indicated that they could choose to buy products packaged in recyclable materials, or that they could buy recycled products and that there should be greater consumer purchasing choices in relation to these.

There were also suggestions for the introduction of refill schemes in supermarkets as being a method by which excess packaging could be reduced. This also led to further discussion on the operation of these systems. There was a general consensus that refill systems had operated in the past but were largely unavailable now as a result of the convenience led lifestyle. It was felt that the reintroduction of such schemes might be successful, but only in relation to specific products namely cleaning, personal hygiene and a limited range of food products e.g. cereals. Any such systems would have to be easy to use, address safety and hygiene concerns and be cheaper than packaged alternatives.

There were also some suggestions from focus group attendees for direct action that consumers could take to reduce packaging, although awareness as to what direct action they could take to reduce excess packaging was limited. The focus group participants were not aware of the 'Consumer Direct' web-site as a mechanism to allow them to take direct action. The most common response given was to contact the retailers direct either at the individual store level or at head office. Other mechanisms identified by the attendees were to contact their local councillors or MSP's to lobby the manufacturers and retailers on their behalf.

## 6.5 PACKAGING RE-USE

While deposit and return schemes were common in the past, and are still common in other parts of the world, they are not now largely used here. Reverse vending schemes, although being piloted in England by WRAP, are not yet used in Scotland.

The consultation asked *“Do consultees consider more could be done to encourage re-use either through deposit and return schemes or more generally? Options could include “reverse vending” trials in Scotland or trials of deposit and return schemes.”*

The main comment at question 13 concerned **existing initiatives**, with 23 respondents of the 62 commenting perceiving a need to look at what was happening elsewhere in the UK or overseas. In particular, the issue of sustainability was mentioned and 3 respondents saw the need for further research in this area.

There was broad support for the options of reverse vending or deposit and return trials and 18 respondents felt both options should be trialled. Fifteen respondents specifically expressed a preference for reverse vending, while 13 wanted to see deposit and return schemes piloted. Only two respondents stated that they were wary of these approaches. One manufacturer noted *“They are rarely based upon sound environmental reasoning, and more often than not, are a means of protecting local production interests rather than reducing environmental impacts.”*

While there was broad support for these schemes, **some concerns were raised over the practicalities of these types of schemes**. Eight respondents (including 2 retailers and 3 from the packaging sub-group), felt deposit and return schemes might prove expensive, be hard to implement or consume too much space. The same concerns were raised over the implementation of reverse vending schemes by 6 respondents (this included 3 out of the 4 retailers commenting on this question). Health & Safety issues were of concern to 4

respondents; a manufacturer commented “*that re-use is a viable option for some products, glass, plastics etc, but the measurement of the health and safety risks, the environmental impact of cleaning and sterilizing and the transportation costs must be borne in mind when comparing to one trip packaging that can be recycled within the home or locally.*”.

**Loyalty cards and tax incentives** were suggested by 10 respondents who felt that there would need to be some form of incentive to encourage participation, while 2 respondents felt legislation may be needed. The possibility of kerbside collections of re-useable packaging was mentioned by 5 respondents (including 2 in the packaging sub-group), while the need to promote and recognise work done in this field by voluntary organisations was mentioned by 2 respondents from the community sector.

Five respondents expressed the view that recycling is more effective than refilling, while 5 respondents (4 of whom were local authorities) stated their preference for re-use over recycling.

A large number of points were raised by 1 or two respondents and these included:

- The need to promote localisation (2 respondents);
- The need for trials to include education and promotion (2 respondents);
- Consideration of special status for charity shop waste (2 respondents);
- The feeling that schemes have NOT been successful in other countries (2 respondents);
- Problems of access to the schemes for disabled people, the elderly or those without transport (2 respondents);
- The need for more information to be given to consumers on the cost of product packaging and its disposal (1 respondent);
- The need for more information and support for retailers (1 respondent);
- The perception that schemes such as those suggested are barriers to trade (1 respondent);
- The need for standardised bottle designs (1 respondent);
- The need to investigate why deposit schemes fell out of fashion (1 respondent);
- The need to engage retailers (1 respondent);
- Balancing the gains against energy costs (1 respondent);
- Concern that these schemes may reduce local authority recycling rates (1 respondent).

## **6.6 REDUCING WASTE FROM THE RETAILING OF PRODUCTS**

In some instances retailers are able to return unsold goods to the wholesaler and this is standard practice with newspapers and allows the wholesaler to put in place arrangements for centralised recycling. New technology is also giving retailers the opportunity to reduce waste by making products available electronically. Leasing arrangements can also help minimise waste from retailing by encouraging retailers to produce longer life products.

Question 14 of the consultation asked, “*Could more action be taken to reduce waste from the retailing of products? Possible actions include:*

- *(Option 1): Measures to encourage more unsold products to be returned to the wholesaler.*

- (Option 2): Pilot projects on new IT technologies or new ways of providing services which reduce waste.”

As shown in table 6.4, the greatest level of support (16 of the 51 respondents commenting at question 14) **felt that both options had merit**. An equal number of respondents (6) supported each individual option; some respondents did not state a preference.

**Table 6.2**  
**Preference for options given at question 14**

	<b>Option 1</b> <b>Return to wholesaler</b>	<b>Option 2</b> <b>IT technologies</b>	<b>Both Options</b>
Academic / Professional	-	-	-
Community council	-	2	1
Community sector	-	-	5
Consumer	-	-	-
Local authority	3	2	4
Manufacturer	-	-	-
Other public body / publicly-funded body	-	-	1
Packaging	-	-	1
Political party	-	-	-
Environment NGO	-	-	-
Retailer	1	-	1
Service industry	-	-	1
Individual	2	2	2
<b>TOTAL</b>	<b>6</b>	<b>6</b>	<b>16</b>

**The need for legislation** to be placed on manufacturers and consumers was identified by 6 respondents, although 5 respondents commented that **many retailers are already trying to reduce waste** as this has an impact on their costs and 4 respondents felt that this was not an area where government should intervene.

There were suggestions from 5 respondents that **unsold goods could be donated to charity or voluntary organisations** and that this should be promoted. One respondents from the community sector suggested *“A further option to be considered (which is already happening to some extent) is for incentives for more end of lines and ‘seconds’ to be donated to the charity retail sector so that the items can be sold and used in this way rather than either destroyed, thrown away or wasted.”*

Three respondents commented that returning goods to wholesalers would only serve to move the waste from one location to another.

Procurement policies were mentioned by 3 respondents who felt that the problem of overstocking needed to be addressed. Three respondents wanted to see retail waste tackled as part of a life-cycle approach rather than independently. Leasing or hiring arrangements were supported by 3 respondents.

Again, a variety of comments were made by one or two respondents including:

- The need for more research (2 respondents);
- Concerns over problems of retail / supplier agreements (2 respondents);
- Need to take in considerations of older or disabled people (1 respondent);
- Projects seen as a good idea but not always practical (1 respondent);
- The need to reduce specific waste - created by Christmas and Easter or paper receipts (1 respondent);
- Work should be done at EU level (1 respondent);
- Work should be at national level (1 respondent);
- Option 2 may not reduce waste (1 respondent);
- Investigate possible waste reduction via internet purchasing (1 respondent);
- Tackle packaging on “luxury” goods (1 respondent);
- The possibility of an electronic waste forum (1 respondent).

At one focus group, discussions on packaging reduction showed that there was little awareness of what consumers could do to complain about excess packaging.

Individuals attending the consultation event discussed recycling “bring-sites” and other facilities that could be offered at supermarkets and views were that this needs to be fully integrated into planning. Some noted that deposit recycling schemes successfully work in Europe, albeit that they are really only effective where the recycling loop has been closed. Specific suggestions made included:

- Provide more information in store about where customers can recycle;
- Trial MRF facilities at front end of supermarkets and industrial estates;
- Money-off vouchers for customers for recycling (being trialled with Tesco and Sainsbury’s in England).

## 6.7 PROVISION OF INFORMATION

Retailers and manufacturers have a variety of opportunities to provide consumers with information on waste issues. This can be done via advertising, in-store using announcements or displays, on web-sites or through leaflets. However this could lead to information overload for consumers. The consultation asked *“Do consultees consider that retailers and manufacturers could provide more and better information on waste issues to their consumers? If so, what do consultees consider should be done?”*

Almost half (27) of the 61 respondents who answered question 15 **agreed that retailers and manufacturers could provide more and better information on waste issues to consumers.**

The way in which information was presented was mentioned by 23 respondents who felt it should be **clear, meaningful, useful and accessible.** If presented incorrectly, too much information could prove counterproductive and 17 respondents agreed that it would need to be **well thought through.** At the consultation event the Co-op’s red dot scheme was highlighted as a good example of efficient labelling.

*“Much clearer information is required on what is repairable, what is recyclable and what has been made from recycled materials. For example, the repairability of shoes could be identified at the point of sale.”*

Academic / Professional

Labelling was seen as a possible medium for informing consumers; 15 respondents felt that using **consistent labelling with, perhaps, an environmental rating could be a positive step**. Six respondents felt that disposal information should be included on labelling or packaging. Providing consumers with life-cycle or whole product information was preferred by 11 respondents, some of whom suggested using environmental profiles.

Six respondents felt that retailers and manufacturers should publish their waste policies and also make their waste costs public.

More advertising or encouragement to recycle was seen as useful and 16 respondents wanted to see more “where” or “how” to recycle information for consumers.

Other suggestions included:

- That action should be promoted by government or by a national body (3 respondents);
- The view that actions should be targeted on those products causing most waste (2 respondents);
- The need to make consumers aware of possible savings and benefits (2 respondents);
- There could be cost implications for charity shops or second hand retailers (1 respondent).

## **6.8 WASTE AWARE SCOTLAND AWARD FOR THE RETAIL SECTOR**

The consultation document suggests the possibility of an award to celebrate the success of retailers in reducing waste and the consultation asked *“Do consultees consider that an annual Waste Aware Scotland award for the retail sector would be useful? If so, what form should this take?”*

**This concept was supported by half (26) of the respondents answering question 16** and this included 2 of the 4 retailers commenting here.

Twelve respondents did not see the need for such an award while 9 felt that it could be built into existing awards or schemes.

If an award was to be introduced, 7 respondents stressed that in order to be successful it would have to be seen as **prestigious and creditable** and 2 respondents felt such an award would be more effective at UK level. Five respondents mentioned the benefit that publicity would bring to award winners and 2 felt that it could act as an incentive. The process for nominating companies was mentioned by 2 respondents who felt that consumers should be allowed to suggest nominees.

*“while awards can be a successful means to engage retailers, badly founded schemes are ineffective and poor value for money. Effective awards schemes*

*need a good level of press and therefore public interest and genuine interest from the target sector.”*

Other public body / publicly-funded body

Three respondents felt such a scheme would produce waste and excess paper work and be costly to run.

The following comments were made by single respondents:

- Difficult to implement as control over retailing is largely under the control of the supermarket giants;
- Regulations would be more effective;
- Awards for different categories – perhaps by size of business;
- Award for reduction / collection of household waste / reduction of packaging;
- Have a wooden spoon for worst cases;
- Local heats / regional heats;
- Cash award;
- The award could be sponsored by business.

In summary,

- There was broad agreement for a need for guidance and support for retailers to build waste considerations into their procurement process, and some suggestions that legislation is needed to back this up.
- Many consultees also voiced the need for further training for retailers and their employees. However, views were split as to what organisations should have responsibility for its delivery and there were comments that training needs to be tailored to different sectors and / or products.
- In terms of food waste specifically, there was a need for retailers to provide information to consumers, and that information relating to health and hygiene issues specifically should take priority over any packaging issues.
- There was general agreement that more could be done to collect and use surplus food from wholesalers, retailers, caterers and other outlets, along with support for greater promotion of schemes in relation to this.
- A majority of consultees perceived a need to educate consumers on issues in relation to food waste, although there were suggestions that retailers also need to consider actions they can undertake to help reduce levels of consumer food waste.
- Views were relatively split as to whether the Packaging (Essential Requirements) Regulations 2003 are working. Some consultees noted that there is a lack of awareness on the part of some of these regulations and others commented on a lack of enforcement.
- While views were split over which specific options could be utilised to minimise household waste from packaging, a majority of consultees supported some form of action.

Other comments included suggestions for an increase in the number of collection schemes or recycling sites.

- While there was support for re-use through deposit and return schemes, concerns were raised over their practicality and implementation or the type(s) of products best suited to these schemes.
- There was broad support for more action to be taken to reduce waste from the retailing of products, although views on how this could be brought about varied.
- Almost half of the consultees perceived a need for retailers to provide consumers with information and noted the importance of any information being clear, meaningful, useful and accessible.
- Offering a Waste Aware Scotland Award was perceived to be a positive move by around half the consultees.

## CHAPTER 7: CONSUMERS

Almost everything we use in our homes will eventually end up being thrown away. From everyday items such as packaging and food waste to bulkier items like furniture and white goods, each household produces over 1.1 tonnes of waste every year. While there is widespread consumer support for recycling, waste prevention behaviour – as opposed to recycling behaviour – is harder for consumers. The introduction of extra collections for garden waste, paper and glass, and the provision of home composters or wormeries in some local authority areas means that some waste is now being diverted from landfill. Charities also play a role in accepting surplus household goods and clothes for re-use. In order that more waste can be diverted from the general stream, consumer habits need to change so that recycling or re-use become the automatic consumer action when disposing of waste or unwanted items.

Within the consumer sub-group only 1 response was received. Their response dealt solely with plastic bag issues at questions 19 and 20 and so will be reported alongside other responses on this issue in chapter 8. Where comments from the sub-group of individuals are markedly different these have been highlighted.

### 7.1 CONSUMER POWER

Consumer demand influences the decisions made by retailers and service providers and consumer feedback could be more widely used to the same effect. The consultation document acknowledged that *“traditionally, the UK consumer has not been skilled at making effective complaints”*. Companies too need to improve on the way they respond to feedback and complaints. Negative feedback or complaints about waste issues from consumers could play an effective role in helping to reduce waste; especially from excessive packaging.

The consultation asked *“Do consultees consider that further action should be taken to make it easier for consumers to raise environmental and waste issues with retailers and other providers of goods and services? Possible actions could include the provision of further information by Government, consumer bodies and retailers on how to complain about excessive packaging and waste.”*

Fifty-six respondents commented at question 17 and, of these, **30 voiced their support for further action**, with 2 adding the need to tackle excessive consumerism. Only 6 respondents disagreed; citing the fact that schemes and initiatives are already underway in this area or that they do not consider this a Government function. Two respondents wanted to see any action linked to existing initiatives.

**Consumer education** was mentioned by 9 respondents; this, they felt, would help to raise awareness of the issues. One local authority commented *“Most consumers are probably not aware that they can complain to companies about excessive packaging so more promotion and information is necessary to raise awareness and make it easier for consumers to make complaints.”* Eight respondents felt that a packaging or consumer watchdog should be tasked with carrying the proposals and four others felt that Environment Direct would serve this function. One respondent, however, stressed that there was no need for a new quango. Four respondents wanted to see more information for consumers on how to complain, while 3 wanted to see a simple, easily accessible, perhaps on-line, feedback or complaints

mechanism. Four respondents felt that naming and shaming or, alternatively, rewards for good practice, may work well.

Consumers are entitled to leave any **excess packaging with retailers**; 6 respondents felt that this should be more widely publicised or that stores should provide sites for excess packaging to be deposited for recycling.

Those attending focus groups, noted that disposable lifestyles were deemed to generate large amounts of waste. Many indicated that as consumers they were directed via advertising and marketing to buy more, and new, rather than to repair or reuse. Disposable lifestyle was directly linked to convenience buying, the lifespan of products, where it was cheaper to buy new than to repair, and that the availability of repair outlets was limited. Within the groups smaller electrical items were the primary products identified e.g. toasters, kettles mobile phones etc. In addition advances in technology often negated repair e.g. advancement in digital television sets. However this perception was different amongst the attendees in relation to white goods.

The attendees felt that manufacturers had a responsibility to ensure that quality products were produced to lengthen product lifespan. It was also discussed that there should be extended product guarantees, and that extended warranties should not be prohibitively expensive. There was greater consumer awareness and behaviour towards repair and reuse for non-electrical household items. Charity shops and social enterprise schemes were commonly identified as outlets where these items could be repaired and reused.

## 7.2 LOYALTY CARDS

Loyalty cards are traditionally associated with retail chains but these could also be used to reward consumers for making environmentally friendly purchases. Similar schemes already operate in other parts of the world.

Question 18 asked, *“Do consultees consider that environmental loyalty cards should be run in Scotland? It is likely that any such cards would have to be run by retail outlets. Is there any role here for the Scottish Executive and/or SEPA?”*

Twenty-one of the 50 respondents, including 9 local authorities, who answered question 18 **thought this was a good idea** while 12 did not (this included 3 of the 9 individuals commenting here). Six respondents felt they did not have sufficient information to comment. One respondent from the packaging sub-group commented *“We agree that this is a good idea and are aware of similar initiatives set up for users of bring banks.”* Five local authorities and 1 individual agreed that the Scottish Executive or SEPA could have a role to play. One respondent felt that this was not a function of government.

There was concern that the scheme may prove costly and 5 respondents felt it could be bureaucratic and hard to administer. Four respondents highlighted the need to ensure it was based on sound, accurate information and statistics. One respondent from the academic / professional sub-group noted that *“If environmental loyalty cards were introduced we would have to ensure that the information was accurate. We would not want to see a return to the 1980s where we had a plethora of claims, such as environmentally friendly, ozone friendly*

*(when no aerosols contained CFCs), biodegradable (when all washing powders were) etc.”* This comment was also endorsed by one local authority respondent.

Loyalty card schemes are run by many retail chains and 4 respondents thought the new scheme could be tied into these. Two respondents disagreed with this view in that they did not feel it appropriate for retailers to be involved. Three respondents thought that the choice should be left to retailers to decide whether to become involved.

Loyalty card points can induce a “feel-good” factor; 3 respondents worried that this scheme could actually increase purchasing and so lead to waste.

Given that results from this analysis will also help to provide evidence to the Environment and Rural Development Committee on the Member’s Bill proposing a levy on plastic bags, questions 19 and 20 that deal specifically with the issue of plastic bags are dealt with in the next chapter (chapter 8).

### 7.3 UNWANTED MAIL

There are some measures already in place to reduce the amount of unwanted “junk” mail that is delivered and the Mail Preference Service run by the Direct Marketing Association is probably the best known. Question 21 of the consultation asked *“Do consultees consider that further action should be taken in relation to unwanted mail and leaflets? If so, what?”*

Nineteen of the 53 responses to question 21 stressed **the need for the Mail Preference Service to be more widely promoted**, with 2 commenting that they would like to see this service made more straightforward and accessible. Eight respondents wanted to see an **increase in the use of the Royal Mail opt-out of unaddressed mail service** and 6 respondents felt that the system should be opt-in rather than opt-out. Existing agreements were seen as sufficient by some respondents, and 4 out of the 8 respondents making this point were local authorities.

Further actions in relation to unwanted mail included the suggestion, from 8 respondents, that **all unaddressed mail should be banned**; this included 4 of the 10 individuals commenting on this question. For example, 1 individual commented *“All unwanted mail should be stopped and companies who continue to distribute junk mail should be heavily fined.”*

Nine respondents wanted to see tighter restrictions and perhaps a levy on unaddressed mail but 3 respondents felt that voluntary agreements should be tried first. Three respondents suggested that companies who send out mailshots should need the consent of the householder before sending mail to them. Three respondents suggested an increase in the use of email to send promotional and other information.

The use of window envelopes, which have to be deconstructed for recycling, was commented on by 4 respondents who would like to see printed rather than window envelopes used. One respondent felt that all unaddressed mail should be fully recyclable.

Information or education for consumers on how to avoid their names or addresses being placed on mailing lists was suggested by 2 respondents.

Specific items of mail that respondents would like to see reduced included flyers in newspapers or magazines (mentioned by 2 respondents) and political mail at election time (2 respondents).

Unwanted mail was perceived as a problem by most of those attending focus groups but without prompting was not directly linked to waste prevention. Once prompted, a small number of attendees indicated that they were using the Mailing Preference Service, although the majority were unaware of this as a resource to reduce unwanted mail. It was recommended that the public should be made aware of this and other related services to encourage their engagement in Household Waste Prevention.

## 7.4 HOME COMPOSTING

Household waste that is compostable is estimated at a level of 30% of the total waste from households. Three options for dealing with compostable waste are home composting bins, food digesters or wormeries. Question 22 of the consultation asked *“Do consultees consider that further action could and should be taken to promote home composting, food digesters or wormeries in Scotland? If so, what?”*

There were only 48 responses to question 22 and almost half (23) of **these wanted to see more composting initiatives, or wide(r) publicity for existing ones**. In addition, 18 respondents voiced support for **further action being taken to promote home composting and wormeries**. Only 3 respondents felt that no further action was needed and 1 respondent felt that legislation would be required.

Eighteen respondents felt that low cost or free home composters should be made available to the public. In addition, more publicity and information should be utilised to encourage use, with 12 respondents commenting that householders would need **access to a variety of information including cost benefits**. In addition to home composters, 11 respondents suggested similar schemes for food digesters and 10 respondents wanted to see the use of wormeries more widely promoted. As one Individual noted,

*“All homes with gardens should be offered free or subsidised compost bins, digesters or wormeries, along with community training to make the most of them. Should someone not want compost, then a digester would suit. Those who don’t want any facility to home compost should perhaps have to accept they should pay for the uplift of their compostable waste, unless there were over-riding good reasons why they cannot compost.”*

There could be positive benefits for local authorities, with 9 respondents commenting that these measures would help to meet targets.

Financial issues were raised by 11 respondents who felt that **funding would be required** and 5 respondents who specifically suggested charges for green waste uplift to promote home composting.

In order to measure the success of these schemes, 4 respondents felt that targets should be set. However, 2 respondents felt that the suggested schemes would not work in all areas, for example high density housing areas.

Education in schools or information for consumers was seen by 5 respondents as essential to promote the use of home composters.

One respondent commented on the need to recycle rather than compost corrugated paper and another felt home composters should be a requirement in all new-build housing.

At three of the focus groups, home composting was recognised as a way to reduce household waste and it was recognised by respondents that both garden and fruit and vegetable waste could be composted. However, one concern raised in relation to composting was the perceived problem associated with rodents foraging for food.

In summary,

- There was majority support for further action to be taken to make it easier for consumers to raise environmental and waste issues with retailers and other providers of goods and services. That said, there were also suggestions that consumers need to be educated to raise their awareness of the issues or how they can complain about excessive packaging. There were also suggestions of a need for a change in consumer attitudes to create less of a “disposable goods” lifestyle.
- There was a level of support for some form of environmental loyalty card, although there were some concerns about how such a scheme would operate.
- In terms of unwanted mail specifically, a number of respondents noted the need for an increased awareness and promotion of the Mail Preference Service.
- There were calls for more composting initiatives and for wider publicity for existing initiatives.

## CHAPTER 8: PLASTIC BAGS

A Member's Bill seeking to impose a levy on plastic bags has been introduced and considered by the Environment and Rural Development Committee of the Scottish Parliament. The Committee asked that the Minister report back by the end of August 2006 and findings from this consultation will inform that report.

Over half (86) of all responses received dealt solely with the issue of plastic bags; these responses only provided answers to the questions which deal with this issue (questions 19 and/or 20). A standard letter was produced as part of a coordinated campaign from industry and this was submitted by 37 respondents. Additional letters contained standard paragraphs or quotes. Some respondents had already made a submission or given evidence to the Environment and Rural Development Committee and some of these were appended to responses.

### 8.1 PLASTIC BAGS

The consultation document listed 6 options in relation to plastic bags. And asked "*Which of the above options would consultees prefer in relation to the use of plastic bags?*"

The options were:

*Option 1: to take no action specifically on plastic bags.*

*Option 2: to promote voluntary measures by retailers and other bodies handing out plastic bags.*

*Option 3: to introduce a levy on plastic bags, as proposed in Mr. Pringle's Bill.*

*Option 4: to introduce a levy 'upstream' (on suppliers of bags) .*

*Option 5: to extend the levy to paper bags as well as plastic bags.*

*Option 6: to ban the supply of plastic bags to consumers altogether.*

This question attracted the largest response of any question in the consultation with 149 respondents commenting.

As seen in table 8.1, **over half (89) of all respondents felt that no action should be taken.** This figure includes 78 of those responding solely to the plastic bag questions and 11 other respondents. Twelve respondents from the packaging sub-group and 61 individuals felt no action should be taken. Some respondents did not state a preference.

There was support from 24 respondents for Option 2 (to promote voluntary measures by retailers and other bodies handing out plastic bags) while preferences for this came from most of the different groups of respondent, the highest level of support for this option came from local authorities.

The 23 respondents supportive of a levy as proposed in Mr Pringle's Bill included the respondent from the consumer sub-group who commented "*Charging consumers for their use of plastic bags can be an important element in awareness raising of environmental issues and a potential catalyst for wider behaviour change*". Six respondents commented that some retailers already make a charge or do not provide plastic bags.

**Table 8.1**  
**Preference for options given at question 19**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
Academic / Professional	-	1	2	1	-	1
Community council	1	2	4	-	2	-
Community sector	-	1	5	1	1	1
Consumer	-	-	1	-	-	-
Local authority	2	9	3	1	4	2
Manufacturer	1	4	1	-	-	-
Other public body / publicly-funded body	-	1	-	-	1	-
Packaging	12	-	1	-	1	-
Political party	-	-	-	-	-	-
Environment NGO	-	-	2	1	1	1
Retailer	6	2	-	-	1	-
Service industry	6	-	1	-	-	-
Individual	61	4	3	1	-	2
Whole consultation respondents	11	21	21	5	10	7
Plastic bag only respondents	78	3	2	-	1	-
TOTAL	89	24	23	5	11	7

A key theme, in 93 responses, was that **plastic bags are widely reused in households**. By banning or charging for them, waste from other sources such as bin liners would rise, as would methane from paper bags and emissions from lorries. One retailer noted,

*“We do not believe that a carrier bag levy would be proportionate to the scale of the environmental impact. Carrier bags are already subject to levy’s resulting from the Waste Packaging Requirements. However, if the Executive considers the waste created by carrier bags at 0.3% of the municipal total is sufficient to warrant additional action we believe that a blanket carrier bag tax (option 5) would create the best mix of environmental and economic benefits”.*

Studies have shown that plastic bags make up only 0.3% of the municipal waste stream and 54 respondents commented that **plastic bags have very little environmental impact**.

Concerns that a levy would penalise poorer households, the elderly or those without access to cars were raised by 14 respondents.

Ten respondents mentioned that local authorities might find collection of the levy difficult and suggested that it be collected at tills. A further 7 respondents voiced concern over the administrative burden and associated costs of implementation should a levy be imposed.

Concern that any levy might lead to job losses was also raised by 9 respondents and this included 4 from the packaging sub-group.

Six respondents commented that, as a source of litter, plastic bags are both highly visible and a danger to wildlife.

Suggested exemptions to a levy included compostable bags (2 respondents) and charity shops (1 respondent).

Other comments included:

- More information for consumers to allow them to make an informed choice (4 respondents);
- Comments that the levy had been successful in other countries (3 respondents);
- That any funds raised through a levy be directed to waste prevention projects (2 respondents);
- That the term “plastic bags” needs a clearer definition (2 respondents);
- Any action taken should be at UK level (2 respondents);
- The need for further research (2 respondents);
- That levies in other countries have led to an increase in shoplifting (1 respondent).

At the consultation event, opinion was divided on this subject and amongst the points noted above, the high incidence of re-use, cost implications for charity shops and possible job losses emerged as the main concerns.

At all four focus groups, charging was seen as a positive step that supermarkets could implement to reduce disposable plastic bag use. Other solutions included:

- Provision of biodegradable alternatives such as paper bags
- Greater use of durable bags
- Greater reuse of disposable plastic bags
- Encouragement of plastic bag recycling at supermarkets
- Waste Aware training for supermarket staff.

## **8.2 PRIORITY**

Question 20 asked *“What priority do consultees consider the Executive should give to reducing the use of plastic bags in the context of work to promote household waste prevention generally?”*

Again, this question attracted a large response; with 112 respondents commenting.

As can be seen in table 8.2, 48 of the consultees responding here favoured a low priority in reducing the use of plastic bags in the context of work to promote household waste prevention generally. A further 42 consultees felt that no priority should be given to reducing the use of plastic bags in the context of work to promote household waste prevention generally.

The majority of the consultees favouring low or no priority were those responding to the plastic bag questions only, while analysis of responses from those who replied to the consultation as a whole shows a different preference with the majority (17) favouring assigning a high priority to this issue.

**Table 8.2**  
**Suggested level of priority at question 20 (all assigning priority level)**

	No priority	Low priority	Medium priority	High priority
Academic / Professional	-	-	-	1
Community council	1	-	1	4
Community sector	-	-	-	4
Consumer	-	-	-	-
Local authority	-	5	1	3
Manufacturer	-	1	-	1
Other public body / publicly-funded body	-	-	-	-
Packaging	6	8	-	-
Political party	-	-	-	-
Environment NGO	-	-	-	-
Retailer	1	3	-	-
Service industry	-	1	-	-
Individual	34	30	1	4
Whole consultation respondents	3	13	3	17
Plastic bag questions only respondents	39	35	0	0
<b>TOTAL</b>	<b>42</b>	<b>48</b>	<b>3</b>	<b>17</b>

In addition to the main points already raised at question 19 and which were then reiterated at question 20, action on plastic bags was seen by 26 respondents (including 8 local authorities) **as a symbolic step which would serve to raise awareness of wider waste issues.**

*“Whilst recognising that the levy would only tackle a component of waste arisings we believe that designed and implemented appropriately, with an accompanying education programme, it would be a highly symbolic step in raising awareness about the need for behaviour change and tackling a largely unnecessary product that is symbolic of our throwaway attitude to resource use.”*

Environment NGO

Twenty-five respondents suggested that there were more important waste management issues that should be tackled and 4 respondents called for the reintroduction of supermarket boxes or more widespread use of the “bag for life” concept as a way to reduce plastic bag usage. One respondent from the manufacturer sub-group commented *“It is important that environmental improvement focuses on those areas of greatest risk. For example, plastic materials account for a small percentage of waste arising (3% waste arisings) compared to paper and cardboard products (26% waste arisings). Discriminating against specific packaging formats should not be allowed.”*

In summary,

- When faced with a variety of options in relation to the use of plastic bags, the majority of consultees felt that no action should be taken. The two other options attracting a level of support were for either promotion of voluntary measures by retailers and other bodies handing out plastic bags or for the introduction of a levy on plastic bags, as proposed by Mr Pringle's Bill. A number of consultees felt that plastic bags are already re-used by many households.
- In considering the priority that the Scottish Executive should give to reducing the use of plastic bags, there was a distinct difference of opinion between those who responded solely to the questions on plastic bags and those who responded to the consultation as a whole. Consultees who dealt only with questions 19 and/or 20 on plastic bags felt that this issue should be given no priority or low priority. Analysis of responses from those responding to the whole consultation show the greatest number considered that this issue should be given high priority. In combining all responses, a small majority are in favour of assigning a low priority.

## CHAPTER 9: COMMUNITIES

There are a number of community groups and charity shops that will accept used goods for sale and re-use. In this way, clothes, toys, books and bric-a-brac as well as larger items can be diverted from landfill sites. Newer trends such as e-bay have also promoted a culture of re-use. Conversely, falling retail prices in relation to furniture and white goods have caused a move away from repairing older items as, in many cases, there is now no economic incentive involved.

Eleven respondents from the community sector and 9 community councils responded to the consultation and, where appropriate, their comments have been reported alongside those of the other respondents.

At the consultation event, in addition to covering some of the points in the consultation document, attendees discussed the role of schools in educating children on waste awareness. Eco-schools, with active waste minimisation, have had some success in Scotland. Education in general was also discussed and attendees concluded that the Scottish Executive has a role to play in educating the public.

### 9.1 RE-USE AND REPAIR

The consultation asked *“Do you consider more could be done to promote the re-use, repair and second-hand sector in Scotland? If so, what?”* and at question 24 *“Do you consider more work should be done to take a Scotland-wide over-view of the re-use of products such as furniture, paint and carpets? If so, what?”*

Fifty seven respondents commented at question 23 and the key theme to emerge **was the need for more information or education for consumers**. Fourteen respondents felt this should include education in schools, more publicity and encouragement to re-use and recycle. One community council commented *“More could be done in this area, mainly training, education and support. There is now a real lack of people in all communities who have the knowledge to repair and re-use. Finding organisations that re-use items can be hard and many people are not aware that it is possible.”*

Thirteen respondents, including 5 local authorities, suggested that **this work would require funding**, with 1 local authority commenting on the need for *“additional funding to get projects off the ground and become sustainable.”*

While encouragement for consumers was the main theme to emerge, **encouragement for those working in the re-use and repair sectors** also attracted a similar level of comment. Twelve respondents (including one community sector respondent) commented that *“the community sector has pioneered the reuse of furniture, appliances, carpets, paint and small household items. These organisations should be supported to increase reuse.”* This support included more training (cited by 9 respondents), the need for second-hand shops to be sited in main shopping areas (7 respondents), national campaigns to reduce any stigma attached to second-hand goods (4 respondents), financial help with transport costs (2 respondents), and promotion of local networks (2 respondents).

Another suggestion for re-use and repair establishments was made by 6 respondents who felt these should be situated close to civic amenity sites or that these sites be redesigned with re-use in mind.

Some charity shops are not currently allowed to resell electrical goods and 8 respondents considered that with sufficient training and quality standards this could be changed.

Concern over the cost of repair was raised by 7 respondents, with 1 local authority noting, *“The fundamental problem with encouraging more re-use and repair is that it is often a difficult argument as purchasing new goods is so often just as or cheaper than getting an old item fixed. This may undermine any serious attempts to promote this sector.”*

Re-used items play an important role in waste prevention and 5 respondents felt they should be recognised as having diverted waste from landfill.

Six respondents felt that further research was needed to identify which of the current schemes are most effective in diverting waste.

Other comments included:

- Identify and promote a re-use strategy (4 respondents);
- Re-use is not always the best option (4 respondents);
- Have occasional kerbside collections of re-usable goods (3 respondents);
- Public sector procurement policies should encourage repair and re-use (2 respondents);
- Investigate initiatives in other countries (2 respondents);
- The need for EU re-use standards (1 respondent);
- The need for a clear definition of “re-use” (1 respondent).

Comments at the consultation event largely mirrored those above and also included calls for a more consistent message across Scotland and concerns over confusion in legislation regarding charities and community groups. Key points emerging were:

- Confusion over legislation. Legislation needs to be reviewed regarding reuse/repair to support charities, community groups (Exemptions etc);
- Reuse needs to be recognised more. Given its due weighting;
- Reuse needs more Education & Awareness to make it a more mainstream form of purchase;
- Need to be more consistent messages throughout Scotland;
- No incentives for consumers to repair;
- Repair not considered viable due to speed of changes in electrical equipment, etc. Parts not available, costs excessive.

Only 48 respondents commented at question 24 and the main theme to emerge was the need for a **sustainable and national network of schemes** run in partnership with the Scottish Executive, CRNS and SWAG, and that this may need initial funding. Public-social partnerships were also suggested by 4 respondents.

**The need for incentives** was commented on by 9 respondents at both of the questions on re-use, both for consumers in the form of tax credits or for local authorities to encourage re-use frameworks.

All of the main points raised at question 23 were reiterated at question 24. Additional key comments included the **social benefits that re-use and repair can provide**, with 6 respondents mentioning this benefit and a public body/ publicly-funded body highlighting the fact that *“some 110 million litres of paint sit in people’s sheds when they could be put to good use by charities, low income and community groups.”*

Three respondents saw the need for a community repaint development officer and a further three felt that existing regulatory barriers should be removed.

## 9.2 COMMUNITY COMPOSTING

Community composting is more widely developed in other parts of the UK. Waste from households is collected or brought to a local site where a community sector organisation composts it and then provides or sells it for use locally.

Question 25 asked: *“Do you could consider more could be done to promote community composting in Scotland? If so, what?”*

Eleven of the 47 respondents to this question voiced agreement that **more could be done to support community composting**. Ten respondents, including 3 from the community sector, suggested that local authorities should instigate or provide community composting services.

*“A co-ordinated programme of support, information and training tailored to the needs of the community composting sector should be developed.”*

Community sector

The need for clearer **guidelines, requirements or regulations for handling and storing; including training on these issues** was raised by 9 respondents, of whom 5 were local authorities. Problems with existing regulations such as Animal By-products or Waste Management Licensing were raised by 8 respondents who wanted to see regulatory barriers removed.

There was a feeling that these schemes would be more effective in some areas than in others and 8 respondents felt research was needed to identify the best areas for community composting schemes. Raising awareness of community schemes was seen as important by 4 respondents.

*“The outputs of community composting schemes, in terms of the volume of waste recovery achieved, can be quite limited. Blanket promotion should be avoided; more work should be done to demonstrate which factors contribute to a successful scheme and communities targeted appropriately; primarily through such organisations as the Community Recycling Network for Scotland.”*

Local authority

Concerns were raised over the cost of community schemes and 7 respondents questioned whether they could be sustainable or whether the benefits were sufficient to justify the costs. In addition, 6 respondents stressed that schemes needed to be inexpensive for users and suggested the need for funding. Start-up grants were mentioned by 3 respondents who felt that these may be needed, for instance, for land purchase.

The potential for schemes to be promoted through new or existing campaigns was raised, with 4 respondents wanting to see some form of advertising. Four respondents felt this work could be carried out through CRNS and 3 felt that schemes should be run by paid staff rather than volunteers.

Education for consumers, and especially through schools, was seen as important by 3 respondents

Service level agreements were perceived to be useful and 4 respondents felt that local authorities needed guidelines to ensure agreements were helpful.

Community composting was seen as preferable to home-composting for some respondents, especially in urban areas. Four respondents commented on this and one from the Academic/ Professional sub-group noted, *“Community composting should be developed for areas of Scotland with a high density of population where home composting is not an option. Whilst home composting should remain top of the hierarchy for composting (due to the proximity, lack of transport requirements etc) in order to enable the removal of an estimated 20% of compostable waste from municipal waste it is important that facilities are available for populations where there may not be the available space to undertake home composting.”* One local authority, however, commented that not all areas would want to be involved.

Measuring the effectiveness of schemes was mentioned by 4 respondents who wanted to see audits of tonnage or cost effectiveness.

Another possible area of work included food waste pilots and this was mentioned by 3 respondents.

### 9.3 FUNDING

Community waste groups should aim to be self-sustaining with funding either from the sale of their service or products or through service level agreements with local authorities. Waste prevention, however, is hard to measure and therefore setting funding levels is problematic. One source of funding is INCREASE, a Scottish Executive fund for community waste organisations. The consultation asked *“Do you think that current community waste funding sources are designed to encourage waste prevention projects? If not, what changes do you think are required?”*

Very few key themes emerged from the 39 respondents commenting on this question. **The two main points raised were the need for extended funding** (mentioned by 9 respondents, including 3 from the community sector) Once again, **the need for consumer education and information** was cited by 8 respondents, 4 of whom were local authorities.

Community waste initiatives should aim towards sustainability and 5 respondents mentioned the need for schemes to be self financing, with 4 respondents asking for extra funding for existing projects. Four respondents specifically mentioned funding from INCREASE but felt that the prerequisite estimation of tonnage prevention is seen as a barrier to any innovation or research based projects. The possibility of alternative funding, perhaps through lottery grants, was mentioned by 2 respondents and 2 respondents wanted to see start-up funding more easily accessible.

*“Once this project is up and running it should become sustainable on its own in the future, and a detailed plan of how this would work would be a major part of the criteria it would have to meet before funding was supplied. Too many useful projects fall down when funding is withdrawn.”*

Local authority

The problem of grant applications and other bureaucracy was seen as a possible area of concern. Three respondents again stressed the need for projects to be staffed by trained or experienced employees rather than volunteers and 2 suggested that red-tape should be reduced.

Three respondents wanted to see an auditable measurement of success. Encouragement for waste prevention projects was identified as key by 4 respondents.

The key theme emerging from the consultation event was the SWF will no longer be ring-fenced after 2007-08 therefore there is a possibility that funds may disappear into other budgets. Suggestions for ways in which local authorities could spend their money for waste prevention included education, home composting, community composting, unwanted mail campaigns, waste exchange, reuse and libraries.

#### **9.4 RECYCLING CREDITS**

Local authorities can pay recycling credits to organisations recycling waste. The Community Recycling Network for Scotland is at present trying to establish to what extent this power is being used. The Scottish Ministers could compel local authorities to pay credits and the consultation asked *“Do consultees consider that recycling credits should be made mandatory? If so, why?”* and Question 28: *“Do consultees consider that recycling credits should be extended to re-use and/or waste prevention?”*

Nineteen out of the 48 respondents answering question 27 felt that **recycling credits should not be mandatory and this included 14 local authorities**. Eight respondents felt they should be mandatory, with 4 suggesting that this would reward and encourage voluntary or charity-based schemes.

Among those voicing disagreement, concern was expressed by 5 respondents that this would divert money from other, possibly more effective, schemes. Four respondents, including 3 local authorities, felt that this proposal would lead to local authorities losing part of their budgets. One local authority noted, *“If recycling credits were made mandatory then local authorities would effectively be losing control of part of their budget. Although we could not support this in principle, we also believe that local authorities are best placed to decide how*

*to encourage recycling in their communities.*” Five respondents voiced the opinion that local authorities should decide this issue and that, in fact, some already offer this incentive.

Four respondents wanted to see service level agreements or some other formalised agreement with local authorities and this included 3 respondents from the community sector. However, 3 respondents felt that there was too much bureaucracy involved in such a scheme.

The need for set criteria or accreditation was raised by 4 respondents and a further 4 mentioned the need for set targets and consistency.

Suggestions for specific recipients of credits included charity or community groups and 6 respondents felt credits should be mandatory for these organisations.

On the question of credits being extended to re-use or waste prevention projects, 15 of the 45 respondents commenting voiced disagreement with this suggestion, including 9 local authorities. Fourteen had specific concerns that monitoring such schemes would be costly and difficult, especially in measuring the amount of waste prevented. Three respondents felt there was a need for set criteria, standards or targets.

*“We agree with the 2002 Strategy Unit report ‘Waste Not, Want Not’ that the recycling credits scheme should be amended to better reflect the entire set of options within the waste hierarchy which can lead to a diversion of waste from disposal, and the relative priority of those options. We would support the extension of credit payments to all household waste re-used. The value of re-use credits would need to be determined through local negotiation.”*

Other public body / publicly-funded body

Thirteen respondents voiced their agreement to question 28, with 5 believing this would benefit both organisations and local authorities. Three respondents wanted to see support for initiatives based on merit.

In addition to the points raised in the consultation responses, those attending the consultation event gave specific examples for an options system which could include free access to equipment, free accommodation and price per tonne. They also mentioned the need for a Scottish version of the ‘Recycle Now’ Campaign to help raise awareness.

A number of themes emerged from the consultation event and these included:

- Should be reuse credits as well as recycling credits;
- Recycling credits should be mandatory;
- Should be some rewards for any/all reuse/waste prevention;
- Options system (free access to equipment, £/tonne, free accommodation);
- Beneficial to consumers and LA’s to work with communities/charities (this will cost less than dealing with costs for bulky uplifts and costs of dealing with fly tipping);
- Guidance should be issued to LA’s on recycling/reuse credits;
- Simple standard messages for sustainability (e.g. 5 key points);
- Scottish version of the ‘Recycle Now’ Campaign is required to generate public interest;
- Hard to get funding for Education & Awareness projects;

- Community groups are the main deliverer in Education & Awareness, so there is a need to improve funding to allow them to do so;
- Communities will link to community group's message better than LA's;
- Local level – peer support/pressure;
- Large projects tend to be one-hit, no sustaining message.

In summary,

- There was a general view that more could be done to take a Scotland-wide overview of the re-use of products such as furniture, paint and carpets, although many cited a need for more information or education for consumers and encouragement for those working in the re-use and repair sector. That said, there were also comments that it can be difficult to persuade consumers to consider re-use or repair for some low cost items. There were also suggestions for a sustainable and national network of schemes and the social benefit that this can bring to Scotland.
- The concept of community composting was supported by some consultees, although views were that this would work better in some communities than others.
- Views on whether current community waste funding sources are designed to encourage waste prevention projects were limited.
- A greater number of consultees supported making recycling credits non mandatory than mandatory. Alternatives suggested including giving local authorities decision making powers on this issue or development of service level agreements. There was also less support for extending recycling credits to re-use and / or waste prevention.

## CHAPTER 10: LOCAL AUTHORITIES

Local authorities have a statutory duty to collect and dispose of household waste and a large proportion of waste collected from households goes into landfill sites. Under the Landfill Allowance Scheme, which came into force in 2005, local authorities have a set limit on the amount of biodegradable municipal waste (BMW) they may send to landfill and consequently are looking at schemes to help meet their targets; this will, in turn, help Scotland to meet its obligations for reducing landfill of BMW under the EC Landfill Directive.

The bulk of comments in this section of the consultation came, not surprisingly, from the twenty local authorities who responded to the consultation. While a broad range of issues were covered by respondents in response to the questions in this section of the consultation paper, most were made only by a single respondent. Where possible, points have been grouped together and reported on. A full list of the points raised is appended to this report.

### 10.1 SIZE OF BINS AND FREQUENCY OF COLLECTIONS

The 1990 Environmental Protection Act places a duty on local authorities to collect household waste and most local authorities have kerbside waste collections on a weekly basis. In addition to general household or communal bins, some local authorities have introduced recycling bins including those for green waste or for paper.

The London Borough of Barnet has interpreted the Act as giving it powers to make recycling compulsory, while some other authorities have used this power to limit the amount of waste they collect and thereby encourage recycling. The consultation asked, *“Do consultees consider that there would be merit in a similar approach to Barnet’s (making use of certain receptacles mandatory, to encourage recycling) being adopted by local authorities in Scotland? Clearly, before authorities in Scotland took any action of this type, they would need to be satisfied about the scope of the existing legislative powers in Scotland.”*

Seventeen of the 52 respondents commenting on question 29 **voiced agreement with this proposal** and this included 4 local authorities. Five respondents felt that these powers should be more widely known. Ten voiced disagreement and, again, this figure included 4 local authorities. Six respondents felt that more research was needed to gauge success of existing schemes.

**The key theme to emerge in relation to mandatory recycling was the comment that some local authorities have already chosen to operate similar schemes;** 10 respondents (including 7 local authorities), felt this should be left to the individual authorities to decide.

*“Several local authorities in Scotland, (including the respondent council), have already introduced the mandatory use of containers provided by the authority to encourage recycling. Strict monitoring of the use of these containers is required to ensure maximum recycling.”*

Local authority

There was a perception that the scheme might be hard to enforce, with 8 respondents (including 3 local authorities) voicing **concern over regulation and enforcement**. Three

local authorities and 2 other respondents saw the need for clarification of existing regulations in this area. Two respondents felt there needed to be a unified approach to dealing with households who chose not to comply. One local authority voiced concern that this approach could lead to friction between authorities and householders.

There was a view that individuals should aim towards recycling being their initial consideration when disposing of waste, and 7 respondents felt that households are, or would be, happy to recycle. *“Recycling when feasible should be regarded as a norm for all good citizens, not an option for the environmentally committed.”* (Academic / Professional). However, 5 respondents commented on the need to ensure that variation in households and householders were catered for, and the elderly and disabled as well as those living in tenement housing were mentioned. Five respondents felt that more education and encouragement to recycle would be needed.

Costs were mentioned; 4 respondents felt these would rise as extra staff and new technology would be needed. Two respondents raised questions over whether this would be self-funded – perhaps through fines – or whether the Scottish Executive would provide funding.

Three respondents worried that the suggested approach would shift the emphasis away from waste prevention and 3 others felt that these measures would be premature and counter productive, suggesting full implementation of the voluntary kerb-side collection scheme first.

Other comments, largely from local authorities included:

- That compulsion may be needed if local authorities are faced with landfill penalties (2 respondents);
- Possible dishonesty – using neighbour’s bins (2 respondents);
- Possible increase in fly-tipping (2 respondents);
- That some form of incentive may be needed (2 respondents).

At question 30 the consultation asked, *“Should the Scottish Executive consider action in relation to the size of bins for residual waste provided by local authorities and/or the frequency of collection by local authorities? If so, what action should be taken? Potential options include:*

- *(Option 1): Primary legislation on bin sizes and frequency of collection. However, this would take a number of years to be enacted. It also might mean a high degree of central control on an issue where there are bound to be local variations (e.g. type of housing stock; nature of recycling services provided).*
- *(Option 2): Advice on size of residual bins and frequency of collections. It might be possible to provide such advice during the work on best practice in recycling which the Executive plans to carry out with authorities over the next year.*
- *(Option 3): Making funding streams, such as the Strategic Waste Fund and Grant Aided Expenditure for refuse services, relate directly to size of bins and frequency of collections”*

As table 10.1 indicates, **option 2 received the most support**; from 17 out of the 51 respondents replying at question 30. Of the 11 local authorities responding to this question, 9 were in support of option 2.

**Table 10.1**  
**Preference for options given at question 30**

	Option 1	Option 2	Option 3
Academic / Professional	-	1	-
Community council	-	2	1
Community sector	-	3	1
Consumer	-	-	-
Local authority	2	9	-
Manufacturer	-	-	-
Other public body / publicly-funded body	-	1	-
Packaging	-	-	-
Political party	-	-	-
Environment NGO	-	-	1
Retailer	-	-	-
Service industry	-	-	-
Individual	1	1	-
<b>TOTAL</b>	<b>3</b>	<b>17</b>	<b>3</b>

**Twelve local authorities and 4 other respondents commented on the need to provide whatever service is best for the area** and 15 respondents stressed that local authorities should be allowed to make these decisions. As one local authority pointed out “*A ‘one service suits all approach’ would not be appropriate or best value in many circumstances.*” Eight respondents pointed out that some local authorities have already reduced their collections and 7 respondents voiced the opinion that this method is more effective than reducing bin size.

Five respondents, including 3 local authorities, felt that no action should be taken, and some respondents did not state a preference.

The need for some sort of incentive, perhaps a council tax rebate, was suggested by 4 respondents. A further 6 respondents felt that while reduced collections may prove unpopular, there was some evidence that they do encourage recycling.

Concern over provision of services for different types of households and householders was again raised by 8 respondents.

*“Making these ideas mandatory ignores the fundamental fact that households vary enormously, both in the waste they produce and in how they handle it. People do not like being treated as averages, nor do they like being treated as a ‘special case.’ However, huge variation has to be catered for.”*

Community council

Concern over the cost of implementing changes, especially in relation to altering bin size, was voiced by 6 respondents who felt that the money could be better used elsewhere. Three respondents felt more research was needed into which option would be most effective.

There was a suggestion that standardisation would be useful, and 6 respondents (including 4 local authorities) suggested that bin sizes, collections and colours should be the same throughout the country. Consistent, central guidance and guidelines would also be useful and 5 respondents wanted to see practical, applicable guidelines for local authorities.

At the consultation event there was a discussion on one local authority who had successfully reduced their collections.

#### **Case History – Midlothian Council (Consultation event)**

The Council changed to a fortnightly collection for residuals with recyclate picked up weekly. Large families or families with children in nappies get a larger bin – but only in the short term.

The amount collected has decreased by 40% and the recycling rate has gone up. There has been a lot of political support from Councillors to do this. The workforce has increased by 60%.

In general, householders accepted this change, although there had been a few problems with hygiene. There will also have to be an increase in the number of routes offered.

One of the reasons for success was because it has been done in-house, so there was flexibility built in.

However, it is important to ensure that this is not seen as a reduction in service.

## **10.2 GREEN WASTE COLLECTION**

Many local authorities have introduced green waste collections in their areas and this adds to the recycling–composting rates. Kerb-side collections have, however, the effect of increasing the amount of waste collected as householders dispose of garden waste into these bins rather than dealing with it themselves through composting or disposal at a civic amenity site (recycling centre).

Question 31 of the consultation document asked, *“Do you think that further research and guidance is required on green waste composting to minimise the effect on waste arisings? As indicated below, local authorities are already empowered to charge for the uplift of garden waste.”*

Out of the 48 respondents commenting at question 31, 19 voiced their support for further research or guidance, with only 2 disagreeing.

Guidance was requested on how to encourage and educate householders on composting issues and 12 respondents (including 7 local authorities) felt that education was key.

Research into composting is currently underway by WRAP and other agencies, and 10 respondents felt this should be examined.

*“WRAP will shortly be publishing the outcome of a significant piece of research which identifies the optimal approach to organic waste in the municipal waste stream. This is likely to propose greater emphasis on home*

*composting and separate food waste collections with a reduced role for free garden waste collections.”*

Other public body / publicly-funded body

A key issue to consider is that kerbside collection may discourage composting and 6 respondents felt that collections should only continue where composting proves problematic, for example in flatted properties. Three respondents felt that charges for green waste collection should be national policy.

The consultation document acknowledged that more green waste collection may mean more waste entering the stream and 6 respondents agreed with this point, while a further 3 commented that green waste collection is only worthwhile if waste is removed from the waste stream. Three local authorities, however, viewed green waste collection as an integral part of the waste collection service.

Five respondents were concerned that charging for green waste collection may mean an increase of landfilling biodegradable material with waste being disposed of in general bins or by fly-tipping.

The need to suit green waste collection services to each individual areas was raised by 4 respondents and 4 respondents requested guidance for local authorities on this issue.

Two local authorities commented that excluding home composting from landfill diversion targets excludes the use of this waste prevention technique. Three respondents, including 2 local authorities, commented that including home composting schemes in waste diversion figures would lead to local authorities being more inclined to promote home composting.

Three respondents disagreed with the statement in the consultation document that *“there is a good market for compost meeting the PAS 100 standard”*.

### **10.3 CHARGING**

Local authorities make no charge for household waste collection and under the terms of the Environmental Protection Act 1990 they are not allowed to do so. However, they can – and in many cases do – charge for uplifting bulky waste. They may also charge for garden waste collection although this is not common practice.

In order to allow local authorities to impose charges for waste collection, primary legislation would be needed. One option for charging is that of “direct variable charging”, also known as “pay as you throw”. Under this type of charging scheme, households are charged depending on the amount of waste they place in their general bin. The downside is that this type of charging can have adverse effects on those with lower incomes and may lead to an increase in fly-tipping.

The consultation asked 3 questions in relation to charging:

Question 32 asked, *“Should the Scottish Executive consider amending the existing regulations allowing charges to be made for the collection of other types of household waste. If so, what changes should be made, and why?”*

Although 11 of the 54 respondents commenting at question 32 agreed with this proposal (in comparison to 7 who disagreed), the main comment, made by 15 respondents, including 5 local authorities, was **the concern over a possible increase in fly-tipping or other illegal disposal practices**. This issue was raised throughout the section on charging, with 7 respondents asking for guidance on fly-tipping specifically at question 33 and 7 commenting that fly-tipping may be a result of the direct variable charges at question 34.

*“Whilst we support the general principle that producers and consumers should be responsible for the environmental costs of their actions, there are potential risks to the natural heritage from charging for uplift of waste. As the consultation notes, charging can lead to an increase in fly-tipping, which impacts adversely on visual amenity and on wildlife and habitats. The impacts from fly-tipping of garden waste include the potential risks to biodiversity of garden plants becoming established.”*

Other public body / publicly-funded body

As has been seen in responses to other questions, **the need for flexibility** was seen as an important factor by 9 respondents (including 6 local authorities) who felt authorities should decide what was best for their own areas. This issue was also raised at question 33 with 9 comments on local discretion and at question 34 by 3 respondents. One local authority commented *“Due to local variations e.g. socio-demographic factors, we consider local authority control for setting the level of charges for other types of household waste should remain.”*

Five respondents commented on the need to treat the causes of waste. Seven respondents (including 4 local authorities) felt that the Scottish Executive should not consider amending regulations.

Suggestions on which charges should be imposed included:

- Hazardous waste (5 respondents);
- Bulk waste – to encourage re-use (4 respondents);
- Garden waste (1 respondent);
- Charge for disposal rather than collection (1 respondent).

Five local authorities commented on the need to change consumer behaviour and felt that charges could help towards this goal, although 2 other local authorities acknowledged that charges would prove unpopular.

Guidance on possible exemptions for those on low incomes was requested by 5 respondents and this theme was repeated at question 33 where 3 respondents again asked for guidance.

Further research was seen as important by 4 respondents in order to identify the pros and cons of charges and 3 respondents mentioned the need to research the use of incentives rather than charges.

The need for consistency, across all areas as well as all waste types, was seen as an important issue with 3 respondents mentioning the need for standardised charges.

Question 33 asked, “*Should the Scottish Executive consider issuing guidance on charging for special uplifts of bulky items and garden waste? If yes, what should the guidance say?*”

Views on this proposal were split, with equal numbers of respondents voicing support and opposition for this specifically. Nine respondents (including 3 local authorities) voiced support for this proposal; 9 respondents (including 4 local authorities) disagreed.

The main point made at question 33, by 10 of the 49 respondents commenting here, was that **if guidance were to be issued it should include a fair, consistent, basic charging structure or guidance on calculating this.** Five respondents wanted to see robust, best practice guidance. “*The Scottish Executive should however consider reviewing all collection (and charging) policies and issue an annual summary citing what they consider to be good practice.*” (Local authority)

Six respondents felt that the guidance should be issued to householders and could include information on limits, charges and benefits as well as specific local recycling information.

Two local authorities felt that guidance would be needed on the impact of charging and two respondents asked for guidance on the scope of existing powers. “*The EPA 1990 does allow for charging although many see the legislation as implicit rather than explicit. Any amended legislation should be robust and explicit.*” (Local authority)

Other suggested areas in which guidance was felt useful included:

- Contracting out to the community sector (2 respondents);
- The use of incentives (1 respondent);
- A clearer definition of household waste (1 respondent);
- Ability to pay (1 respondent).

Question 34 asked, “*Do consultees consider that it would be helpful to consider further the issues about “direct variable charging”? The next step would be to issue a full consultation paper on this subject, outlining the arguments for and against and the financial implications.*”

**Fifty-five respondents commented on question 34 with 21 respondents voicing support for this proposal.** A further 6 respondents stated that they would welcome a full consultation on the subject, and 9 commented on the need for further research on a variety of issues such as enforcement, impact, cost and technologies. Seven respondents felt research was needed to ensure that direct variable charging did not impact disproportionately on any particular group or area. A public body / publicly funded body commented “*As long as appropriate safeguards are in place to protect socially and geographically disadvantaged populations, ( ... ) would strongly agree with sentiments to introduce 'direct variable charging'. This creates a link between the waste we produce and the cost of handling and disposing of the non recyclable elements.*”

While 6 respondents felt direct variable charging would not be a helpful step, 6 other respondents (including 3 local authorities) felt that it may be of interest in the long term but should not be seen as a short term measure. Reasons given included the need to ensure the correct infrastructure or to maintain public confidence.

The success of similar charging schemes was discussed. Five respondents felt the experiences of other countries should be examined and 5 others commented on the success of such schemes overseas. One respondent from the packaging sub-group commented “*Such charging has proved successful in Scandinavian countries where the effects of a household’s waste behaviour are shown directly on the council tax bill. Check it out ! Stop saying ‘It’ll never work here.’*”

Concerns over the costs of implementation were raised by 4 respondents, with 3 respondents noting that these would not justify any other benefit. Other concerns included the problem of identifying which households to charge, especially in cases where communal bins are used (this issue was raised by 3 respondents).

At the consultation event, attendees raised many of these issues during discussions, although they were generally supportive of further work in this area. Key points raised were:

- Variable charging is fair
- Variable charging makes the connection between consumer and waste produced
- Fixed charge for failing to recycle would be easiest option
- Tenements would pose a problem
- Not everyone has a recycling service, so charge could be unfair
- At what point would you bring in a charge?
- How would you enforce a charge and that costs of enforcement would be high
- Bin weighing is expensive and impacts on time required for collection rounds
- Flytipping potential
- It would prompt consumer demand for low waste products
- There are different ways of charging – by weight, volume, frequency, bag and tag etc
- Surveys show that people think of waste as the no1. service they receive from their local authority
- Charging would probably be met with resistance by the public – would have to be done at a national level and not a voluntary or local level (some disagreement on this)
- The quality of recyclate could be affected
- There could be a disproportionate effect on low income households

Overall, these individuals were supportive of further work in this area.

## **10.4 INCENTIVES**

As an alternative to charging, incentives could be used to encourage recycling and waste prevention measures, and incentive schemes are proposed or underway in some other parts of the UK and further afield. The consultation asked “*Do consultees consider the Scottish Executive should carry out further work on incentives? If so, what? One option would be trials of incentives with a number of authorities.*”

**Twenty-two of the 52 respondents commenting on incentives voiced their agreement that further work should be carried out** and this included 8 local authorities. Six respondents disagreed, with 5 commenting that it seemed very time-consuming or costly for

little gain. However, incentives were seen as a more positive measure than charges and 3 respondents stressed the need for positive reinforcement of waste awareness.

**A pilot scheme was proposed by 14 respondents** (including 6 local authorities). The need for research or to examine results from other countries was suggested by 7 respondents and the WRAP front-of-store research was specifically mentioned by 3 respondents.

*“Yes, the Council supports pilot schemes or trials to assess options for recycling incentives. The success of incentive schemes can only be judged in real life situations, therefore to assess the practicality of incentive schemes trials would have to be undertaken, then if successful rolled out to a wider area and re-evaluated.”*

Local authority

Any incentive scheme would need to be seen as fair to all households and 6 respondents wanted to see equal access to all facilities or services.

Comments on the need to examine the use of incentives within the wider context of whole waste life-cycle were made by 4 respondents.

Suggested incentives included:

- Council tax rebates (3 respondents);
- Recycling credits (2 respondents);
- Prize draws (1 respondent);
- Funds for charity (1 respondent);
- Tie-in with loyalty card schemes (1 respondent).

It was also suggested, by 3 respondents, that there be incentives for local authorities in meeting or exceeding targets.

Two respondents commented that central funding would be needed, although 1 local authority felt that any incentive scheme should aim to be self-financing and one local authority felt that funding could come from manufacturers.

Similar points both for and against the use of incentives were raised by attendees at the consultation event. Key points were:

- Do not think incentives are a good idea – it is taxpayers money that is being used. People have been recycling for years and should be doing it anyway. Need more of a stick, not a carrot.
- There is not ‘one solution’ to waste growth – we should be looking at anything that might reduce generation – including incentives
- Incentives could go hand in hand with the stick.
- Incentives are not necessarily long term – they should be used to change behaviour and then gradually withdrawn.
- Can only roll out when 100% of households have the opportunity to recycle
- Difficult with tenements.

- It's how you sell it – say that low waste households get a discount, rather than saying that high waste households are penalised.
- How do you address prevention – as distinct from recycling?
- How do you measure reduction?
- Need an open mind on the whole subject – it may mean a major change in the way we do things
- Local authorities are at the end of the line – manufacturing is where greatest impact can be achieved.

## 10.5 WASTE CONTRACTS

The consultation highlighted the need for waste management contracts / service level agreements to ensure that they do not encourage the generation of waste. Question 36 asked, *“Do consultees consider that waste management contracts/service level agreements should include incentives for waste prevention? If yes, how is this best achieved? Do consultees consider that waste management contracts/service level agreements can currently include perverse incentives to increase the generation of waste? If yes, what can be done to tackle this?”*

Forty-seven respondents commented on question 36, and **13** (including 5 local authorities) **agreed that SLAs or Waste Management Contracts (WMC) should include incentives for waste prevention.** Ten respondents specified incentives to re-use, recycle or divert waste; this could include the provision of recycling credits. Seven respondents wanted to see contracts including a waste reduction requirement. One respondent from the community sector replied *“Yes they should, need to move away from the concept that the more waste you process the better. Not sure how!”*

One major concern, voiced by 9 respondents (6 of whom were local authorities) was that **current WMCs are linked to tonnage rather than volume**, making heavier goods more financially rewarding. Two local authorities felt that contracts should be aimed at reducing capacity of tonnage as the end result.

Disagreement was voiced by 5 respondents, including 1 local authority, and 7 respondents commented that contractors have no control over the amount of waste generated. Landfill shortfall was of concern to 4 respondents and there was a comment from one local authority that *“As it is the Scottish Executive that encourages PPP or PFI projects and it is very hesitant to encourage authorities to strike out on their own, then the least the Scottish Executive could do is offer to pay any financial penalties local authorities incur for not landfilling enough waste.”*

Research into best practice, environmental impact or the need for scenario planning was highlighted by 6 respondents. Two local authorities felt that SLAs needed to provide an auditable trail of waste disposal.

There were 2 comments on the need to research sustainable construction or the problems of building waste.

## 10.6 OTHER CONTRACTS

The consultation document states the “*local authorities have considerable purchasing power*” and can therefore influence demand for “green” products. Question 37 asked, “*Do you consider that contracts (other than waste management) let by local authorities have scope for provisions on waste prevention? If so, which ones? There is clear scope to minimise waste in construction, although this may not impact on household waste. The best time to make adjustments to contracts may be when they are due to be renewed/relet.*”

Forty-five respondents commented on question 37 with **11 voicing their agreement that there was scope for provisions on waste prevention in local authority contracts**. Only 1 respondent – a community council – felt this was unlikely, and 1 local authority commented that these provisions would have little impact on household waste.

Waste prevention measures were mentioned by 12 respondents (9 of whom were local authorities) and included recycling, re-use, sustainability and disposal. One local authority commented,

*“All contracts issued by authorities should be evaluated on a range of factors, these should include sustainability, waste minimisation, recycling content, and ease of disposal at the end of their life. These issues should be written into the council’s purchasing/contract standing orders to ensure the Best Practicable Environmental Option is designed into the purchase at the start.”*

Some respondents commented on specific contract types including contracts for:

- Civil engineering, construction or demolition (9 respondents);
- Office furniture or housing department furniture purchases (7 respondents);
- Catering or school catering (4 respondents);
- IT equipment (3 respondents);
- Office materials or supplies (3 respondents);
- House clearances (3 respondents);
- Landscaping (2 respondents);
- Cleaning services (1 respondent);
- All tradesmen (1 respondent).

In addition, 6 respondents felt these provisions should be included in all public sector procurement contracts, with 4 respondents voicing the need for “green” procurement policies to be standard.

*“The McClelland Report with its recommendations on centralising much public sector procurement has a great opportunity to embed good sustainability practices into contracts led and let by the Executive and its associated bodies.”*

Individual

Guidance, perhaps in the form of an eco-footprint tool, for procurement officers was seen as essential with 4 respondents commenting on the need for guidelines on standard requirements. A kitemark or standards were suggested by 3 respondents.

Three respondents felt these measures should only apply if the real cost benefit proved to be greater than an increase in contract costs.

The need to make use of experience developed by WRAP or Envirowise was mentioned by 1 local authority while another asked for guidance on compliance with EU procurement rules.

## 10.7 SYSTEMATIC APPROACH TO WASTE PREVENTION

The Scottish Executive has made funding available to local authorities to minimise in-house waste from their services and powers granted under the Waste Minimisation Act 1998 allow them to take any steps necessary to minimise waste within their area.

Waste minimisation and prevention initiatives help local authorities meet their targets under the Landfill Allowance Scheme. The consultation asked a series of three questions on waste prevention; the first asked *“Should the Scottish Executive take action to ensure local authorities do more on waste prevention? If so, what?”*

Twenty-three out of the 55 respondents commenting on this question agreed **that the Scottish Executive should take action**, although, 13 respondents (including 10 local authorities) felt that more funding would be required. As one local authority noted, *“However it is one thing to prepare a plan quite another to implement it. This Council has already asked the SE what funding would be put in place to activate the plan. To date there has been no response on funding“.*

Ten respondents felt that the Scottish Executive should not take action and comments from these respondents (who included 5 local authorities) included a belief that current actions and targets suffice or that this should not be an Executive function.

A variety of suggestions for support were made, with 6 respondents asking for provision of clear targets, 2 respondents wanted to see statutory requirements, and 8 asking for examples of best practice. Four respondents asked that training be provided. Six respondents wanted to see guidance on procurement and 4 local authorities felt that each area should have a waste prevention officer or specialist staff. The need for sound data on which to base policies was raised by 4 respondents.

Guidance on the application of waste prevention schemes was requested by 6 respondents.

Interaction between local authorities and contractors, whether charities, voluntary organisations, retailers, manufacturers or suppliers, was seen as an issue with 10 respondents commenting on the need for better communication or co-operation.

Bringing waste awareness to the forefront of the agenda was mentioned by 9 respondents who saw raising awareness as a key area.

Six respondents commented that there may be a need for incentives for businesses and consumers in order to encourage them to play their part, and 2 respondents specifically noted that there should be an emphasis placed on the construction industry as there is potential for large environmental gains to be made in this area.

Three respondents felt better use could be made off the landfill tax allowance scheme.

Attendees at the consultation event were unsure as to the meaning of “systematic approach” and felt a national awareness campaign would be merited.

Question 39 asked, “*Should the Scottish Executive lay down targets on local authorities in relation to waste prevention? If so, what should these targets require and how would this be measured?*”

**Nineteen respondents agreed that local authority targets should be set and this included 4 local authorities.**

Nine respondents provisionally agreed to this but felt that feasibility studies may be needed first to identify how this could be measured and base data to measure against. Five respondents (including 4 local authorities) wanted to see targets set against absolute or reduction in waste tonnage or volume. Setting targets within the context of the National Waste Plan’s aim to stop growth by 2010 was proposed by 5 respondents.

*“It is unclear whether an adequate basis for establishing and monitoring any such targets yet exists therefore, it may be worth waiting until the improved data collection over the last few years has settled in terms of MSW arisings so that targets can be based on accurate underlying figures.”*

Other public body / publicly-funded body

Five respondents agreed with the need for targets but felt these should be set more widely; perhaps covering the whole public sector, while 4 respondents felt that there should be targets for individual local authority departments.

**However, 12 out of the 53 respondents answering this question disagreed and this included 5 local authorities.** These respondents felt that targets would prove impractical and have difficulties in measuring or quantifying waste prevention, or that differences in areas may mean some authorities would have advantages over others. Three respondents suggested measurements based on waste per head of population and 1 local authority felt these should be based on residual waste arisings.

Five local authorities and 2 other respondents felt that there were already a great many targets for local authorities and examples given included landfill, recycling, diversion and EU regulations amongst others, and that another was not needed.

Question 40 asked, “*Do local authority officers require more training on the skills needed to encourage waste prevention? If so, what training is required and who should provide it?*”

**Twenty-two of the 47 respondents commenting here agreed with the need for training,** although 7 disagreed or felt these skills do (or should) already exist. In addition to training, 7 respondents saw the need for some form of knowledge exchange or a forum for information sharing.

*“Good quality, practical training which concentrates on learning from real life situations, and best practice schemes and guidance from across the UK*

*would be helpful. It would also be valuable for local authority officers in this field to receive media and public relations training and this can be invaluable in assisting a scheme to become successful.”* Academic / Professional

Five respondents were unsure as to what training could be offered, either because they did not have enough information on which to base their opinion or because they felt this could depend on the skill level of individual staff.

**The types of training** identified included:

- Waste prevention (12 respondents);
- Practical training including examples and best practice (11 respondents);
- Media or marketing skills (4 respondents);
- The role of agencies involved in waste prevention (3 respondents);
- Training on composting programmes (3 respondents);
- Training on community based projects (including training for those in the community (3 respondents).

**The training could be provided by:**

- Training from local authority specialist staff including Waste Prevention Officers and waste management staff (5 respondents);
- Chartered Institute of Waste Management (2 respondents);
- WRAP (2 respondents).

In addition, 3 respondents saw the need for training for all council staff, not simply those in Waste Departments, and 2 respondents felt that all public sector organisations should receive this training.

Two respondents felt the training should be free and 5 others suggested that training should be funded by the Scottish Executive. Three respondents noted that this training already exists but may be underused due to cost considerations.

A co-ordinated approach across all local authorities was suggested by 4 respondents and 2 respondents wanted to see training co-ordinated with the construction and manufacturing industries.

## **10.8 FUNDING FOR LOCAL AUTHORITIES' WASTE PREVENTION WORK**

The consultation mentions that in Ireland there is a specific fund for local authority waste prevention work and in Scotland some Strategic Waste Fund awards include provision for waste prevention. The consultation acknowledged the need for funding to provide measurable gains and value for money and asked “*Do consultees have any comments on the allocation of Strategic Waste Fund resources to waste prevention work?*”

Thirty-eight respondents commented on question 41, with 15 commenting on **the need to allocate more money to waste prevention or to reducing waste arisings**. Eight respondents felt money should be allocated to waste prevention training and education. Six respondents felt that funding for waste prevention should be separate from the Strategic

Waste Fund, and 3 respondents commented that allocation of resources should have the same priorities as at present. One local authority commented *“The SWF does not lend itself to funding waste prevention work, as it is difficult to measure and therefore evaluate whether it has delivered value for money or how much it has cost per tonne. If waste prevention work is to be carried out a separate fund should be made available, otherwise recycling (providing tonnage) will continue to be given priority over waste prevention.”*

Restrictions on funding were mentioned by 7 respondents who commented that funding should only be allocated subject to production of a waste prevention plan, and 4 respondents felt any scheme would need to demonstrate best value before funding was allocated.

Specific funding requirements mentioned included a need for more “on the ground” funding, with 7 respondents requesting increased funding for pilot schemes, local groups and small projects. Home composting was seen as meriting extra funding by 6 respondents, while 4 respondents felt money should be spent on raising awareness.

Other issues included:

- More funding for real nappy initiatives (4 respondents);
- More funding to all types of waste reduction options (2 respondents);
- More funding provision for WRAP (1 respondent);
- More funding for SWAG (1 respondent);
- Less funding for community groups (as it does not provide best value) (1 respondent);
- Equal allocation to all local authorities (1 respondent);
- More resources for the Strategic Waste Prevention Fund (1 respondent);
- The need to recognise the contribution of waste prevention activities towards diversion targets (1 respondent).

Concerns were raised at the consultation event about what will happen after Strategic Waste Fund allocations change in 2007-08.

In summary,

- A number of consultees agreed with the proposal for Scottish local authorities to adopt a similar approach to that adopted in the London Borough of Barnet, and some noted that some local authorities already operate similar schemes.
- When asked specifically about the size of bins provided by local authorities for residual waste, the greatest level of support was for **advice** on the size of residual bins and frequency of collections (the highest level of support coming from local authorities). However, there were some comments that services need to be tailored to specific areas or types of household.
- In terms of green waste collection specifically, there was support for further research and guidance on green waste composting to minimise the effect on waste arisings. Again, there were some calls for this to be tailored to individual areas. There were some concerns that kerbside collection serves to discourage composting.

- Although there was support for the Executive to consider amending the existing regulations allowing charges to be made for the collection of other types of household waste, there were some concerns over a possible increase in fly-tipping or other illegal disposal practices.
- Views on whether or not the Executive should consider issuing guidance on charging for special uplifts of bulky items and garden waste were split. If guidance is to be issued, the main point raised by consultees was the need for a fair, consistent, basic charging structure and guidance on this.
- From those commenting, there was majority support for direct variable charging. Similarly, there was majority support for the Executive to carry out further work on incentives, with some consultees noting the importance of “positive” measures to help bring about waste awareness. A pilot scheme was suggested by some consultees.
- A greater proportion of consultees agreed with the proposal for waste management contracts or service level agreements to include incentives for waste prevention than disagreed. A significant number also noted that there was scope for provisions on waste prevention in local authority contracts.
- A majority of consultees agreed that the Executive should take action to ensure local authorities do more on waste prevention, although funding for this was perceived by some to be an issue. It was also noted that other types of organisations also have a part to play in this. In terms of setting targets for local authorities in relation to waste prevention, a greater number of consultees agreed with this than disagreed, although there were some queries as to what targets should be set against. Some respondents also noted a need for training in this area.
- There were some comments on the need to allocate more money to waste prevention or to waste arisings, although there are concerns as to what the position will be in 2007-08 when Strategic Waste Fund resources are scheduled to change.

## 10.9 OTHER ISSUES

One final question was asked of respondents and asked “*Are consultees aware of any other action which could be undertaken to prevent waste? If so, what?*”

The majority of comments from the 50 respondents answering question 42 summarised or reiterated points already made in their answers to previous questions.

The main points that were highlighted included:

- Education and raising awareness (11 respondents);
- Following successful examples from overseas countries (4 respondents);
- The need to change habits and attitudes (3 respondents);

- The need for manufacturers and retailers to play a part in waste reduction (3 respondents);
- The need for an holistic approach rather than individual initiatives (3 respondents);
- The anomaly in LATS regarding home composting (2 respondents);
- Facilities for recycling plastic (2 respondents);
- The need for action across all sectors (2 respondents);
- More work on eco-footprints (2 respondents).

While the consultation was generally well received, four responses contained criticism that,

- A large amount of paper had been wasted by poor layout;
- It was a missed opportunity and lacks ambition;
- Many questions relate to “soft issues” which would have little effect;
- Education should have played a more prominent role.

Three respondents gave examples of other action and these are summarised below:

**Innovative thinking** (Individual)

*“Consideration could be given to supporting innovative thinking at whatever level that is needed.”*

**The use of new technologies** (Community council)

*“Research the latest technology for Energy from Waste with minimum pollution problems.”*

**Closed loop recycling** (Packaging)

*“Closed loop recycling prevents waste ending up in landfill.”*

In addition, two substantial responses were submitted which did not address the consultation on a question by question basis but which detailed the respondents policies and priorities. One, from a political party, explained the party’s policy on Zero Waste:

Zero Waste, or preventing waste at source, targets production and distribution to prevent the possibility of waste and can benefit both the environment and save money. The milk-bottle delivery system was given as *“a prime example of a virtually waste-free (and zero-emissions) delivery/collection system.”* As well as environmental and economic benefits, the response deals with how businesses can aim for zero waste and gives examples of best practice, both from the UK and overseas. The response urges the Scottish Executive to take action towards this aim and concludes *“If we accept that Zero Waste will deliver substantial social, economic and environmental benefits, what is to stop us from publicly declaring that Zero Waste is our intention?”*

The other, from an Environment NGO, outlined their key priorities for waste prevention. At some points it was possible to refer these back to specific questions and so, where possible, their opinion has been included at the relevant chapter.

This response also highlighted the need to work towards “zero waste”. Other main points raised included the need for mandatory targets across all sectors and at all points of the life-cycle. A need for tougher regulation which should be well designed and targeted. Funding should be targeted at the top of the waste hierarchy; *“So far Scotland has addressed the middle of the hierarchy with action to facilitate recycling and there is now a danger that the*

*next phase will be recovery, missing what should be the critical first area for action - prevention. There is an urgent need to re-evaluate strategy and retrace our steps, before we progress any further down the hierarchy. In short we have focused on a solution to 'waste disposal' and not 'waste creation'.*” The need for a culture change in how waste is perceived, processed and regulated. Problems with effective implementation of the Landfill Directive. They concluded *“We want Scotland to take a lead in Waste Prevention in the UK and to push the rest of the UK in line as it has done in other areas most notably concessionary travel and controls on public smoking. “*