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Information about you

Contact details and publishing consent:

Organisation/Group

Organisation/Group name*:
Renewable Energy Association

Organisation/Group address:**
2nd floor,
25 Eccleston Place
Victoria
London

Organisation/Group postcode:**
SW1W 9NF

Organisation/Group contact name*:
Jenny Grant

Organisation/Group contact email*:
jenny@r-e-a.net

Representative body for professionals

Organisation/Group type 'other':

Title*:
N/A

Forename or initials*:
N/A

Surname*:
N/A

Full postal address:**

Postcode:**
N/A

Email address*:
na@example.com

Publish this response

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Design

A We are looking for feedback on these ideas for influencing design of products, business models, services, and systems.

We are looking for feedback on these ideas for influencing design of products, business models, services, and systems.:
• Do you agree with our aspirations on design for a more circular economy?

Design is a good place to start and essential to enable products to play a role in the circular economy. We support research in packaging to enable compostable packaging to be used or to enable packaging to be recycled more easily (or to be more easily removed to allow recycling of food within the packaging) without compromising the protection of products.
A recent (October 2015) report by the Centre for Economics and Business Reasearch (Cebr) looked into the opportunity presented by bio-plastics (defined as biodegradable according to EN13432 and bio-based). The results in this Cebr report are the first of their kind. Their results highlight that bio-plastics have the potential to become an evermore integral part of the UK economy – but only with a supportive regulatory framework.

The study reveals that in 2014 bioplastics provided the following economic benefits to the UK:
• An estimated 1,000 jobs are supported by the industry.
• Around £28.2 million in gross employee compensation
• 50.5 million gross value added (GVA) to the economy

However, Cebr's analysis shows that "given the right conditions, in particular a proper legislative and commercial framework that would enable the development of a UK bio-plastics sector" domestic production of bioplastics could rise to 120,000 tonnes. Cebr predict that this level of production would:
• Support 35,000 jobs in the UK
• Pay around £1.01 billion in gross employment compensation
• Add roughly £1.92 billion of gross value added to the UK economy.

They also underline that the UK bio-plastics sector has the potential to simultaneously: increase economic output; provide jobs; drive research and innovation; promote the efficient use of resources and contribute to sustainable economic growth.
Throughout the report, Cebr finds that the motivation for developing a domestic bio-plastics sector lies as much with the range of economic opportunities that a UK bio-plastics sector can offer, as it does with the opportunities to improve the country's resource efficiency and sustainability.

Given the direction of existing policy and thinking to bio-resources, industry and the circular economy, Scotland is an ideal position to take advantage of the opportunity presented by bio-plastics.

• What other opportunities are there for transformational change?
• Do you agree with the proposed actions for further exploration? Yes

• What other actions would help unlock opportunities?
A wide reaching public procurement approach is needed. As the US has shown, public sector support for the bio-economy can help initiate significant private sector investment.
Political support is crucial. The Scottish government should do more to incorporate the economic potential of the bio-plastics sector into the country's wider growth strategy. The EU's "Europe 2020" is an example of how support for the bio-plastics industry can be integrated into the continent's strategy for achieving sustainable economic growth.
Legislative support can also drive growth. Bans on plastic carrier bags have been introduced in Italy, France, California and Hawaii – and have demonstrated that objectives such as reducing littering can result in other wide-reaching policy benefits such as efficient food waste collection, treatment and soil health.
Unambiguous standards and labelling. The full potential of a bio-plastics industry will only be released if consumers are able to recognise the sustainability benefits of these products and distinguish these from products falsely claiming biodegradability.

Recycling

E We are looking for feedback on the proposed approaches to expand recycling among households and businesses and improve the quality of recycled materials.

We are looking for feedback on the ideas proposed approaches to expand recycling among households and businesses and improve the quality of recycled materials.:
• Do you agree with our aspirations on recycling for a more circular economy?
Yes, we support the work that has been done to date on recycling and we support the ambition for every household in Scotland to have access to a food waste service. We also consider the work being done on measures to support quality, improved market stability and uniformity of collection is very worthwhile.

We support the proposals to improve the quality of collected materials, particularly food waste. Contamination in food waste has operational issues for many of our members both in terms of the cost and time to remove the contamination and in terms of the effect on the quality of the end product (compost and digestate).

• What other opportunities are there for transformational change?
We think that work in this area needs to be supported by effective communications. In addition data collection and analysis is important for assessing effectiveness of measures taken.

Quality is crucial in driving separately collected biowaste up the waste management hierarchy and reducing the costs of their downstream biological treatment and increasing their use in land-based recycling and recovery applications. A fit-for-purpose Code of Practice (CoP) could be used for monitoring contamination in biowaste. The CoP would report on input volume, reject volume and the volume of the product (i.e. the recycled or recovered output material), as well as including best practice on quality management. Such an initiative would improve awareness of the importance of biowaste quality, provide transparent information on contamination to local authorities and industry, and encourage changes that result in improvements to the quality of separately collected biowastes.

• Do you agree with the proposed actions for further exploration?
REA strongly supports the need to review the rural exemption for food waste in the Waste (Scotland) Regulations 2012. We have previously raised this issue with Scottish Government officials and Zero Waste Scotland. Our members have regularly raised this with us as they have come across multiple examples of where businesses are in areas with postcodes listed as rural but in fact fall under the definition of 'accessible small town' according to the 'Defining Rural and Non-Rural Areas to Support Zero Waste Policies' document. Two particular examples of areas that are wrongly defined as rural area exemptions are Ellon and North Berwick. Ellon has a population of 10,100 and is within 30 minutes drive to Aberdeen and Peterhead, therefore should be classed as 'accessible small town'. North Berwick has a population of 6,380 and is within 30 minutes drive of Musselburgh. There are other towns which are significant both in terms of their size but also their population of food businesses which in part is due to their large number of visitors/tourists.

There are also many examples of businesses (with large volumes of food waste) refusing to partake in food waste collections as they fall in under the rural area exemption when there is both a collection service available (i.e. passing that area to reach another non-exempt area) and a treatment facility nearby. We feel this

is a missed opportunity and sends mixed messages to businesses. Reviewing the postcodes (focusing on areas that are currently exempt but shouldn't be) has more potential for increasing the tonnage of food waste collected than the additional tonnage that will be collected when the 5kg per week limit is introduced.

• What other actions would help unlock opportunities?
Improving the quality of separately collected biowaste.
Where biowaste is intended to be claimed as recycled after treatment, all parties who influence its quality have a duty to ensure it is of adequate quality to be recycled. Quality criteria should take into account technical capabilities at the facility/facilities that will manage the waste, operational constraints and the legally agreed financial terms. Contracts for the treatment of biodegradable wastes should be required to include clauses that:
• enable the rejection of any delivery that is contaminated to such an extent that it cannot be sufficiently decontaminated
• provide option to additionally charge for extra work to remove contaminants or to reject any delivery that is of marginal or borderline quality.

Local authorities, businesses and public sector institutions would be more willing to invest in educating householders, employees and contractors about what should go in the biowaste bin, what shouldn't go in it and to visually inspect the contents (as far as practicable during collection). Such a move would also encourage the use of incentives and penalties which aim to increase participation in biowaste collection schemes/services and reduce contamination in bins for biowastes.

The REA's Organics Recycling Group has developed and published a Feedstock Quality Package , which is for voluntary use and is particularly relevant to those who separately collect and treat biodegradable wastes that are made into composts that achieve PAS100 certification. The package includes a position statement, an input specification template and visual assessment guidance.
(http://www.organics-recycling.org.uk/page.php?article=2905&name=The+ORG+releases+its+%27feedstock+quality+package%E2%80%99+to+strive+for+the+quality+of+

We urge the Scottish Government to require that guidance is made available on the acceptable quality of separately collected biowastes and provisions that should be included in biowaste management contracts.
Separation of food waste from secondary and tertiary packaging and other contamination needs to be enforced as the waste producer's responsibility to improve the availability of food waste for recycling.

Separately collecting biowaste of sufficient quality is very important because:
a. most markets are highly sensitive to physical contaminants (glass, metal and plastic) in composts and digestates, especially those that achieve End of Waste (product) status,
b. lightweight, flexible plastics are particularly difficult to remove when screening compost and solid, fibre digestates (without also removing a significant proportion of the compost/fibre digestate with the plastic),
c. lightweight, flexible plastics tend to float in liquid digestate storage tanks so further management steps are required to prevent them from being spread on land with the liquid digestate,
d. the majority of complaints handled by the UK's certification scheme for compost products have been about the presence of plastic.

Recovering Value from Biological Resources

G Recovering value from biological resources

Recovering value from biological resources:
• Do you agree with our aspirations on recovering biological resources for a more circular economy?

Yes we particularly support adding value to digestate and improving the quality of digestate and compost, in conjunction with the improvements in quality of feedstocks to these plants outlined in our response to question E.

We would also support stronger action on public procurement in relation to the phasing out the purchasing of non-renewable biological materials. This should not be limited to just peat. The Scottish Government should look at how it can use the power of public purchasing to help drive the bioeconomy, example areas where immediate, action could be taken is in relation to the purchasing of bio-fertilisers (digestate and compost) to replace where possible all non-renewable fertilisers bought by the public sector, the requirement for all relevant plastics to be bio-based and biodegradable e.g. bags for the collection of organic waste, carrier bags, table and service ware (cutlery, cups plates etc), bio-chemicals such as bio-lubricants when used in areas such as forestry or the marine environment where leakage is inevitable.

• What other opportunities are there for transformational change?

How sustainable use of composts and digestates confers benefit
To date the benefits of applying composts and digestates to soils have been partially quantified, much of the research having focussed on their effects in agriculture (on the receiving soils and crop responses). Their mineral fertiliser replacement value can be readily calculated using current prices for mineral fertilisers. It is an on-going challenge to calculate the financial value of improvements to soil structure and workability that have been observed following repeated applications of composts and digestates.

Carbon sequestration in soil has been recognised by the Intergovernmental Panel on Climate Change (IPCC) and the European Commission as one of the possible measures through which greenhouse gas emissions can be mitigated. Research carried out in the USA by the Environmental Protection Service estimates that centralised composting of biodegradable wastes results in net carbon storage of 0.14 MT of CO_2-e per wet [fresh] short ton of biodegradable inputs composted and applied to agricultural soil. (US Environmental Protection Agency, Summary of GHG implications of composting: http://www.epa.gov/climatechange/wycd/waste/downloads/composting-chapter10-28-10.pdf)

The REA also highlights the following quote from a recent issue of the European Commission publication 'EC Science for Environment Policy' : 'Native soils are thought to take up more of the greenhouse gas methane than land used for farming. This study shows that, while agriculture can exert an adverse impact on soil methane uptake, the application of soil conditioners like compost may compensate for loss of the methane sink function. The researchers propose new land

management strategies based on this finding.' (EC Science for Environment Policy, Compost and climate change: a novel mitigation strategy?, 23 July 2015, Issue 422. See http://ec.europa.eu/environment/integration/research/newsalert/pdf/methane_climate_change_mitigation_by_compost_soil_422na5_en.pdfhttp:/ec.europa.eu/environment/i

The Climate Change Commission's recent report recommends the introduction of: 'firm measures to preserve the fertility and organic content of important agricultural soils, to achieve the stated goal for all soils to be sustainably managed by 2030'
(Reducing emissions and preparing for climate change: 2015 Progress Report to Parliament, Summary and recommendations, Committee on Climate Change, London. See http://www.theccc.org.uk/wpcontent/uploads/2015/06/6.738_CCC_ExecSummary_2015_FINAL_WEB_250615.pdf).

The use of composts and digestates (as well as manures, slurries and other agricultural residues) can significantly contribute to meeting this goal. Depending on soil condition, crop nutrient requirements and other biodegradable resources available at the farm/holding, composts and digestates can:
• partially or completely replace mineral fertiliser inputs,
• following repeated applications, improve soil health and increase soil organic matter content, and
• help reduce soil compaction of farmed soils, which helps to reduce run off from soil surfaces into water ways.

• Do you agree with the proposed actions for further exploration?

Yes – Quality is essential in enabling best use of the resources. The other measures outlined should help to optimise feedstock and to support outputs from plants in the form of fuel and digestates. Research into novel technologies and new markets is essential and should consider productivity and cost effectiveness.

We support the proposals for phasing out the purchasing of non-renewable biological resources such as peat and think that this represents an opportunity to highlight the benefits of composts and digestates. We would encourage guidance to promote the use of bulky organic fertilisers and soil improvers/conditioners (such as composts and digestates).

• What other actions would help unlock opportunities?

In the UK food and farming assurance scheme rules have great influence over whether farmers and growers use composts and digestates made from source separated biodegradable wastes. Circular economy policy should encourage these schemes to urge farmers/growers to maintain and enhance soil health and recognise the positive contributions that can be made by using bulky organic fertilisers and soil improvers/conditioners (such as composts and digestates). Increased use of composts and digestates in all relevant markets should also be supported.

The REA calls for circular economy measures that recognise composting and digestion of biodegradable wastes as activities that contribute to the maintenance or restoration of ecosystems and ecosystem services, provided that inputs to these biological treatment processes result in compost or digestate outputs that are recycled or otherwise recovered by application to land or use in growing media, manufactured topsoils and other products that support plant germination and growth.

The introduction of a robust soil strategy for Scotland that includes the requirement for high quality recycled biowaste back to land and that soils are managed sustainably would be helpful to unlock other opportunities. This could also include targets for soil organic matter content which would in turn drive the organics market (for compost and digestate) and if they were done in the right way would force feedstock quality up the agenda.

Energy recovery

H Energy recovery

Energy recovery:
• Do you agree with our approach on energy recovery in a more circular economy
Yes

• Do you agree with the proposed actions for further exploration?

Yes and we agree with CIWM Scotland – there is a need to understand exactly the requirements of energy infrastructure in Scotland and biomass energy generation and EfW plants could provide a key element of the Scottish government's alternative energy plan.

Planning and waste authorities should be required to work together to ensure that the right capacity is available amongst the right types of infastructure. Amongst other things, this means taking into account planning applications for facilities that manage private sector wastes as well as facilities for managing wastes from households, the public sector, and other sources where the local authority has provided the collection service.

Energy from waste plants should be approoved when they are correct technology, correct scale and correct location and timing. They should be planned to fit into existing infrastructure and to benefit the local community. There should be no threat to operational energy from waste plants contracted feedstocks and businesses as investment was made on the basis of previous regulatory regimes.

Communications

J We would welcome views on the approaches to communication outlined in this section.

We would welcome views on the approaches to communication outlined in this section.:
• Do you agree with our aspirations on communication for a more circular economy?

Yes – we believe that communications are an essential element of successfully moving towards a circular economy.

Measuring Progress

L We are looking for feedback on the proposed approaches outlined in this section.

Measuring Progress:
• Do you agree with our aspirations on measuring progress towards a more circular economy?
Yes

• Do you agree with the proposed actions for further exploration?

Publishing all evidence and data paid for and developed by ZWS and others in research grants helps others exploit that knowledge for better effect. It also ensures a wider peer group and provides valuable information for others to plan and develop new business models.

Equality

M Do you have any comments on the proposals in terms of how they may impact on any particular equalities group i.e. in respect of age, gender, race, religion, disability or sexuality?

Do you have any comments on the proposals in terms of how they may impact on any particular equalities group i.e. in respect of age, gender, race, religion, disability or sexuality?:

Business and Regulatory Impact Assessment

N Do you have any comments on the draft partial Business and Regulatory Impact Assessment?

Do you have any comments on the draft partial Business and Regulatory Impact Assessment?:

Strategic and Environmental Assessment

O 1. To what extent does the Environmental Report set out an accurate description of the current baseline and the business as usual scenario?

Please give details of additional relevant sources:

O 2. Do you agree with the predicted environmental effects as set out in the Environmental Report?

Do you agree with the predicted environmental effects as set out in the Environmental Report?:

O 3. Do you agree with the recommendations and proposals for mitigation and enhancement of the environmental effects set out in the Environmental Report?

Do you agree with the recommendations and proposals for mitigation and enhancement of the environmental effects set out in the Environmental Report? :

O 4. Are you aware of any further information that will help to inform the findings of the assessment?

Please give details of additional relevant sources:

O 5. Are you aware of other ‘reasonable alternatives’ to the proposed policies that should be considered as part of the Strategic Environmental Assessment (SEA) process conducted for the Consultation Document ?

Are you aware of other ‘reasonable alternatives’ to the proposed policies that should be considered as part of the Strategic Environmental Assessment (SEA) process conducted for the Consultation Document ?:

Evaluation

Please help us improve our consultations by answering the questions below.

How satisfied were you with this consultation?:
Very satisfied

Please enter additional comments here.: