

# EQUALITY IMPACT ASSESSMENT – RESULTS

Updated January 2024

<p><b>Title of Policy</b></p>	<p>Scotland's draft Circular Economy and Waste Route Map to 2030 - consultation</p>
<p><b>Summary of aims and desired outcomes of Policy</b></p>	<p>The Scottish Government is committed to moving towards a circular economy and playing its part to tackle the climate emergency. A circular economy, based on sustainable consumption and production, is essential to power Scotland’s transition to a fair, green and sustainable economy, and critical to meeting our obligations to tackle the twin climate and nature emergencies. Material consumption and waste are primary drivers of nearly every environmental problem Scotland currently faces, from water scarcity to habitat and species loss.</p> <p>Founded on evidence and collaboration, the Circular Economy and Waste Route Map is part of the Scottish Government’s wider response to these challenges. It is designed to drive progress on three key fronts:</p> <ol style="list-style-type: none"> <li>1. Setting the strategic direction and laying foundations for how we will deliver our system-wide, comprehensive vision for Scotland’s circular economy from now to 2030.</li> <li>2. Setting out priority actions from now to 2030 to accelerate more sustainable use of our resources across the waste hierarchy.</li> <li>3. Reducing emissions associated with resources and waste.</li> </ol> <p>In 2022, the Scottish Government set out a range of proposals across the resources and waste system through its first <a href="#">Route Map consultation</a>. The consultation sought views on the feasibility and ambition of these proposals in order to drive progress</p>

	<p>against 2025 waste and recycling targets, and to achieve the long term goal of net zero by 2045. Earlier in 2023, the <a href="#">analysis</a> of responses to this consultation was published.</p> <p>Building on the first consultation, the Scottish Government has now published a draft Route Map, which seeks to prioritise and focus on the key actions that will unlock progress across the waste hierarchy to 2030. Through a second consultation on the draft Circular Economy and Waste Route Map, the Scottish Government is inviting views on these priorities, before the Route Map is finalised later in 2024.</p> <p>While the second consultation sets out further detail and refines measures, further specific policy detail for each intervention will be fully defined as the measures are developed. It is intended that the Route Map will enable the Scottish Government to articulate a strategic approach which will contribute towards sustainable resource use and circular economy ambitions.</p>
<p><b>Directorate: Division: team</b></p>	<p>Environment and Forestry: Circular Economy: Strategy Unit</p>

## Executive summary

This Equality Impact Assessment (EQIA) has been carried out to identify potential impacts resulting from the publication of the Route Map. It has not at this time identified any positive or negative issues for protected characteristics groups resulting from the publication of the Route Map itself, but has provided an early indication of evidence that will need to be considered in more detail prior to the implementation of individual interventions.

However, given the importance of assessing the impact on each of the protected characteristics, the Scottish Government has considered the proposals against the needs of the general equality duty as set out in section 149 of the Equality Act 2010 and has considered whether the measures could constitute direct and/or indirect discrimination.

Specifically, the EQIA considers impacts on equalities groups based on the three tests it is required to address:

- Does this policy eliminate discrimination for each of the 9 protected characteristics (PCs). If not, is the discrimination justifiable? Can it be mitigated?
- Does this policy advance equality of opportunity for PC groups?
- Does this policy foster good community relations between people of PC groups.

## Background

Scotland has had a set of 2025 waste and recycling targets in place for over the past decade, spanning the waste hierarchy. As the first Circular Economy and Waste Route Map consultation (2022) set out, Scotland has made good long-term progress towards reaching these ambitions. The total amount of waste going to landfill in Scotland has dropped by over a third over the past decade (3 million tonnes or 30% of all waste managed was sent to landfill in 2021), over 56% of waste was recycled in 2021. In the same year the 2025 target to reduce all waste by 15% was met.

However, in some areas we have fallen short, and progress has not been at the pace and scale required. And while the existing targets have provided a good platform for progress over the past decade, we know from the Route Map's analysis that they are not universally the best indicators to deliver our circular economy, emissions and nature objectives. This recognises that much has changed since most of these waste targets were set in 2010. The climate emergency has intensified our focus on emissions reduction, and how we view and treat our resources.

The Route Map sets out priority actions from now to 2030 to accelerate more sustainable use of our resources across the waste hierarchy, and sets the strategic direction and foundations for how we will deliver our system-wide, comprehensive vision for Scotland's circular economy from now to 2030.

The measures that are proposed in the second Route Map consultation have been divided into four strategic aims, which span action across the waste hierarchy. To ensure the right structures and support are in place to enable action across the circular economy, these aims incorporate a number of specific interventions.

A wide range of evidence was gathered and scrutinised to identify and develop the Route Map interventions. The Route Map aims to highlight key challenges and opportunities - as well as set out potential measures to implement alongside cross-sector stakeholders.

It is recognised that achieving our resources, waste and recycling ambitions, as well as wider emissions reduction, is a shared endeavour. Collaboration and partnership have been critical to our progress so far, and we can only be successful if everyone plays their part – government, households, and businesses.

Planning for 2030 and beyond, it must be recognised that not all policy measures are fully ready to be implemented in Scotland, and are at different stages of development. This is reflected in the draft Route Map. Proposals in the Route Map are grouped into four strategic aims which span action across the whole circular economy, outlined here and in the table below:

- Reduce and reuse;
- Modernise recycling;

- Decarbonise disposal;
- Strengthen the Circular Economy.

Strategic aim	Ambition and interventions
<p><b>REDUCE AND REUSE</b></p>	<p>Reducing and reusing waste are the first goals of the waste hierarchy and central to changing our relationship with materials and products. Building an economic system that moves away from being based on items that are designed to be disposable will bring significant environmental benefits.</p> <p>In this section, we have three main objectives:</p> <ul style="list-style-type: none"> <li>• Drive responsible consumption, production and re-use</li> <li>• Reduce food waste</li> <li>• Embed circular construction practices</li> </ul> <p><b>Proposed actions</b></p> <p><b>Objective 1: Responsible consumption, production and re-use</b></p> <p><u>Priority action:</u></p> <ul style="list-style-type: none"> <li>• Develop and publish a Product Stewardship Plan to identify and tackle the environmental impact of priority products (2025-26)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Deliver a prioritised approach to the introduction of environmental charges for problematic products (by 2025)</li> <li>• Introduce a charge for single-use disposable cups (by 2025)</li> <li>• Consult on actions regarding the environmental impacts of single-use vapes (ongoing)</li> <li>• Review the feasibility of setting reuse targets (from 2025)</li> <li>• Develop restrictions on the destruction of unsold consumer goods (from 2024)</li> <li>• Develop measures to improve the reuse experience for consumers (ongoing)</li> <li>• Deliver behaviour change-based approaches focused on sustainable</li> </ul>

consumption, aligned to Let's Do Net Zero communications (ongoing)

- Identify ways to expand business models that prolong product lifespan (ongoing)

### **Objective 2: Reduce food waste**

Our Review of the 2019 Food Waste Reduction Action Plan outlines that we need to reset our approach to tackling food waste. The actions outlined below are based on the evidence we have so far on how best we can reset our approach. We welcome views on how to enhance this to ensure our reset delivers at the speed and scale required to see sustained food waste reduction results.

#### Priority actions:

- Deliver an intervention plan to guide long-term work on household food waste reduction behaviour change (by 2025)
- Develop with stakeholders the most effective way to implement mandatory reporting for food waste and surplus by businesses (by 2025/26)

#### Further actions:

- Strengthen data and evidence (ongoing)
- Review the rural exemption for food waste recycling, as part of recycling codesign process (in 2024/25 and 2025/26)
- Investigate feasibility of action plans (after 2025)
- Deliver enhanced support for businesses (ongoing)

### **Proposed actions**

### **Objective 3: Embed circular construction practices**

#### Priority action:

- Support the development of regional Scottish hubs and networks for the reuse of construction materials and assets (from 2025)

#### Further actions:

	<ul style="list-style-type: none"> <li>• Develop new and promote existing best practice standards in circular practices within the construction sector, and assess the options for both voluntary and mandatory compliance (ongoing)</li> <li>• Investigate and promote options to incentivise and build capacity for the refurbishment of buildings (by 2026/27)</li> <li>• Investigate and promote ways to reduce soil and stones disturbance, movement and volumes going to landfill (by 2026/27)</li> <li>• Review opportunities to accelerate adoption of climate change and circular economy focussed purchasing in construction (from 2024)</li> <li>• Consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices (ongoing)</li> </ul>
<p><b>MODERNISE RECYCLING</b></p>	<p>Recycling helps to conserve our natural resources, keep valuable materials flowing through our economy and reduce the amount of waste sent to landfill. We want Scotland to become a world-leader in recycling, where recycling and reuse services are easy to use and accessible to all, and support and encourage positive choices. By 2030, we want a high-performing recycling system that has modernised recycling services for households and businesses across Scotland, optimised the performance of collection services, and can recycle most waste types to maximise diversion of waste from disposal. Increasing the amount of materials recycled and increasing the proportion of these recycled in Scotland will deliver carbon reductions, reduce the environmental impacts associated with extracting new raw materials, and create a range of important economic opportunities to reprocess and reuse materials here in Scotland.</p> <p>The objectives are grouped under:</p> <ul style="list-style-type: none"> <li>• Modernise household recycling and reuse services, improving and optimising performance.</li> <li>• Support businesses in Scotland to reduce waste and maximise recycling.</li> </ul>

## **Proposed actions**

### **Objective 1: Modernise household and reuse services**

#### Priority action:

- Facilitate a co-design process with Local Government for high quality, high performing household recycling and reuse services (2024/25 and 2025/26)

#### Further actions:

- Develop a statutory code of practice for household waste services (by 2025/26)
- Introduce statutory recycling and reuse local performance targets for household waste services (from 2030)
- Strengthen the Householder's duty of care in relation to waste (by 2025/26)
- Give local authorities more tools to support household recycling and reduce contamination (by 2025/26)
- Undertake a review of waste and recycling service charging (by 2024/25)
- Review the monitoring and reporting framework for local authority waste services (by 2025/26)
- Develop options and consult on the introduction of end destination public reporting of household recycling collected (by 2027/28).

### **Objective 2: Support businesses in Scotland to reduce waste and maximise recycling**

Commercial and industrial waste accounted for 28% of Scotland's waste in 2018. We want businesses to have the information and support they need to reduce waste and maximise recycling, with clear incentives in place to ensure that the most sustainable choices are the easiest choices.

The interventions in this theme are strongly linked to those outlined to reduce consumption across supply chains, such as product

	<p>stewardship and charges/bans on unnecessary goods and products.</p> <p><u>Priority actions:</u></p> <ul style="list-style-type: none"> <li>• Review of compliance with commercial recycling requirements (2025)</li> <li>• Co-design measures to improve commercial waste service provisions (2026/27)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Conduct a national compositional study of waste from commercial premises (by 2025/26)</li> <li>• Investigate further steps to promote business-business reuse platforms (by 2027)</li> </ul>
<p><b>DECARBONISE DISPOSAL</b></p>	<p>The production and management of waste results in environmental impacts and represents missed economic opportunities for these materials. That is why our focus in this Route Map is to prevent materials from becoming waste in the first place. As we accelerate our move to a circular economy, we will produce less waste. We want to ensure that materials that cannot be avoided, reused or recycled are managed in a way that minimises environmental and climate impacts, encourages management of materials further up the waste hierarchy, and minimises broader societal impacts.</p> <p>The objectives are to:</p> <ul style="list-style-type: none"> <li>• Understand the best environmental outcomes for specific wastes</li> <li>• Ensure there is an appropriate capacity to manage waste</li> <li>• Improve environmental outcomes for waste through innovation</li> <li>• Incentivise decarbonisation of the waste sector</li> </ul> <p><b>Proposed actions</b></p> <p><u>Priority actions:</u></p> <ul style="list-style-type: none"> <li>• Develop and deliver a Residual Waste Plan to 2045 (develop by 2025/26)</li> </ul>



	<ul style="list-style-type: none"> <li>Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector (by 2025/26)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>Support the inclusion of energy from waste in the UK Emissions Trading Scheme (ETS), and investigate other fiscal measures to incentivise low carbon disposal (from 2028)</li> <li>Review and target materials currently landfilled to identify and drive alternative management routes (from 2024)</li> <li>Facilitate the co-production of guidelines for effective community engagement (process underway from 2024)</li> <li>Increase the capture of landfill gas (by 2025)</li> </ul>
<p><b>STRENGTHEN THE CIRCULAR ECONOMY</b></p>	<p>Delivering a circular economy is not a simple task. It requires sustained transformational system change, and a range of actions that are both complementary and coordinated to drive sustainable management of our resources. If Team Scotland are to maximise the opportunities that a circular economy brings to Scotland, we must maintain a strategic approach to its delivery, ensuring the right structures and support are in place to enable action across the circular economy.</p> <p>The objectives are to:</p> <ul style="list-style-type: none"> <li>Provide strategic oversight and direction for the delivery of a circular economy in Scotland.</li> <li>Coordinate action across cross-cutting areas to support progress across the waste hierarchy.</li> <li>Robustly monitor and evaluate progress to enable agile working, take action where we are not on track, and learn from and implement what works.</li> </ul> <p><b>Proposed actions</b></p> <p><u>Priority actions:</u></p>

	<ul style="list-style-type: none"> <li>• Develop a Circular Economy strategy every five years (from 2025)</li> <li>• Set new circular economy targets (determined from 2025)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Review and refresh Scotland's Waste Data Strategy's action plan (development alongside new circular economy targets)</li> <li>• Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities (ongoing)</li> <li>• Develop public procurement opportunities to reduce the environmental impact of public spending, including scoping new legislative circular economy requirements for contracting authorities under section 82 and 82A of the Climate Change (Scotland) Act 2009 (ongoing)</li> <li>• Support greater uptake of green skills, training and development opportunities (ongoing)</li> </ul>
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## The Scope of the EQIA

A framing exercise was carried out prior to the first consultation (2022) process to determine whether an EQIA was required, and to identify relevant areas for investigation. Additions have been made to this document, where necessary and relevant, to incorporate the analysis of responses from the initial consultation.

The publication of the Route Map itself will not have a direct impact on those with protected characteristics. However, it was considered worthwhile to complete an initial EQIA for the Route Map to ensure that potential issues relating to the implementation of the interventions that it contains are identified early, to allow further investigation prior to development and implementation of individual interventions.

Following the second public consultation for the Route Map, and any additional engagement or evidence gathering, this EQIA will be further updated as required.

Further detailed EQIAs will be carried out, as appropriate, as specific interventions are being progressed. This will allow for more detailed consideration of any issues specific to that intervention, and for recommendations to be made on any amendments or mitigating measures needed.

## **Key Findings**

No positive or negative impacts have been identified that will result from the publication of a Route Map.

However, it is possible, that depending on their design, some of the interventions may have both positive and negative impacts on the following protected characteristics: disability, age, race and sex. These include, but are not limited to:

- Development of 'Reduce and reuse' measures relating to food waste, which should consider those who disproportionately experience food insecurity and are dependent upon food assistance. The evidence suggests that women are more likely to be in this position than men.
- Development of 'Reduce and reuse' and 'Modernising recycling' measures. Evidence suggests that on average, disabled people face extra costs of £583/month. On average, £100 for a non-disabled person is equivalent to £68 for a disabled person. This may mean that any increase in cost of living is more challenging to manage and should be carefully considered when relevant measures are developed.
- Development of 'Modernising recycling' measures, such as proposed co-design of recycling services and the review of service charging (for example, for garden waste collections). Evidence suggests that household expenditure varies with the age of the head of household, peaking when the head of household is in their 30s and 40s. This could mean that these households produce more waste and are impacted more by service delivery or charging changes. They may also benefit from a greater range of recycling services available.

These issues should be considered fully during the design of the relevant interventions.

## **Recommendations and Conclusion**

On present evidence, we do not believe that this policy is directly or indirectly discriminatory. This EQIA will be updated again following the second public consultation, to reflect any new evidence, and will be supplemented by additional EQIAs carried out during the development of individual interventions where appropriate.