Scotland's Circular Economy and Waste Route Map to 2030 - consultation

Island Communities Screening Assessment

UPDATED January 2024

Policy Aim

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.

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:
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.
2. Setting out priority actions from now to 2030 to accelerate more sustainable use of our resources across the waste hierarchy.
3. Reducing emissions associated with resources and waste.

In 2022, the Scottish Government set out a range of proposals across the resources and waste system through its first [Route Map consultation](). The consultation sought views on the feasibility and ambition of these proposals in order to drive progress against 2025 waste and recycling targets, and to achieve the long term goal of net zero by 2045. Earlier in 2023, the [analysis]() of responses to this consultation was published.

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.

Strategic aims and associated measures within the Route Map

The Route Map consultation proposes a range of additional legislative and non-legislative measures that can positively contribute to the delivery of the targets and make progress towards net zero goals.

Proposals have been grouped into four strategic aim, 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 strategic aims incorporate a number of specific interventions.

The measures sit within four overarching strategic aims:

Strategic aim	Ambition
REDUCE AND REUSE	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.

In this section, we have three main objectives:
- Drive responsible consumption, production and re-use
- Reduce food waste
- Embed circular construction practices

Proposed actions

Objective 1: Responsible consumption, production and re-use

Priority action:
- Develop and publish a Product Stewardship Plan to identify and tackle the environmental impact of priority products (2025-26)

Further actions:
- Deliver a prioritised approach to the introduction of environmental charges for problematic products (by 2025)
- Introduce a charge for single-use disposable cups (by 2025)
- Consult on actions regarding the environmental impacts of single-use vapes (ongoing)
- Review the feasibility of setting reuse targets (from 2025)
- Develop restrictions on the destruction of unsold consumer goods (from 2024)
- Develop measures to improve the reuse experience for consumers (ongoing)
- Deliver behaviour change-based approaches focused on sustainable 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: • 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) • Investigate and promote options to incentivise and build capacity for the refurbishment of buildings (by 2026/27)

	• Investigate and promote ways to reduce soil and stones disturbance, movement and volumes going to landfill (by 2026/27) • Review opportunities to accelerate adoption of climate change and circular economy focussed purchasing in construction (from 2024) • Consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices (ongoing)
MODERNISE RECYCLING	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. The objectives are grouped under: • Modernise household recycling and reuse services, improving and optimising performance • Support businesses in Scotland to reduce waste and maximise recycling **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 stewardship and charges/bans on unnecessary goods and products.

Priority actions:
- Review of compliance with commercial recycling requirements (2025)
- Co-design measures to improve commercial waste service provisions (2026/27)

	Further actions: • Conduct a national compositional study of waste from commercial premises (by 2025/26) • Investigate further steps to promote business-business reuse platforms (by 2027)
DECARBONISE DISPOSAL	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. The objectives are to: • Understand the best environmental outcomes for specific wastes • Ensure there is an appropriate capacity to manage waste • Improve environmental outcomes for waste through innovation • Incentivise decarbonisation of the waste sector **Proposed actions** Priority actions: • Develop and deliver a Residual Waste Plan to 2045 (develop by 2025/26) • Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector (by 2025/26) Further actions: • 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) • Review and target materials currently landfilled to identify and drive alternative management routes (from 2024) • Facilitate the co-production of guidelines for effective community engagement (process underway from 2024) • Increase the capture of landfill gas (by 2025)
STRENGTHEN THE CIRCULAR ECONOMY	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. The objectives are to: • Provide strategic oversight and direction for the delivery of a circular economy in Scotland. • Coordinate action across cross-cutting areas to support progress across the waste hierarchy. • Robustly monitor and evaluate progress to enable agile working, take action where we are not on track, and learn from and implement what works. **Proposed actions** Priority actions: • Develop a Circular Economy strategy every five years (from 2025) • Set new circular economy targets (determined from 2025) Further actions:

	• Review and refresh Scotland's Waste Data Strategy's action plan (development alongside new circular economy targets) • Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities (ongoing) • 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) • Support greater uptake of green skills, training and development opportunities (ongoing)

The Islands (Scotland) Act 2018

The Islands (Scotland) Act 2018 provides for a duty on Scottish Ministers and other relevant public bodies that they must have regard to island communities in exercising their functions and in the development of legislation.

Section 13 of the 2018 Act obliges the Scottish Ministers to prepare an Islands Communities Impact Assessment (ICIA) in relation to legislation which, in their opinion, is likely to influence an island community that is significantly different from its effect on other communities in Scotland.

Section 13 of the 2018 Act states that an ICIA must:

a) Describe the likely significant different effect of the legislation.
b) Assess the extent to which the Scottish Ministers consider that the legislation can be developed in such a manner as to improve or mitigate, for island communities, the outcomes resulting from the legislation; and
c) Set out the financial implications of steps taken under this subsection to mitigate, for island communities, the outcomes resulting from the legislation.

The Scottish Government's island communities impact assessments guidance sets out four preliminary stages that must be undertaken prior to preparing an ICIA. These are:

1. Developing a clear understanding of the objectives and intended outcomes of the policy, strategy or service including any island needs or impacts
2. Gathering data, identifying evidence gaps and identifying stakeholders
3. Consulting with appropriate stakeholders
4. Assessing whether there are any issues resulting from the proposed policy that are significantly different from those that would be experienced on the mainland, or on other islands

If any significantly different impacts are identified, an ICIA will be required.

Framing

This screening assessment seeks to complete the first two stages of the ICIA process by identifying whether there are issues which merit further exploration through research and engagement with island representatives.

The aim of the Route Map is to achieve its ambitions throughout Scotland, including within island communities. There is an awareness that there may be specific challenges for these communities, which this impact assessment begins to explore.

The Route Map is focused on identifying strategic aims and associated measures, and the specific policy detail for each of these will not be fully defined at this stage. 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.

The publication of the Route Map will not directly impact island communities. However, there is potential, once the measures are implemented that they may have impacts. This Island Communities Screening Assessment is therefore an overview identifying any broad likely impacts. This iteration of the document has been updated following the first public consultation. Further, more detailed Island Community Impact Assessments will be carried out where appropriate when individual measures are designed and developed fully.

Alongside the first consultation on the Route Map proposals to accelerate progress in this area, we also consulted on a Circular Economy Bill to bring forward primary legislation to underpin our key policy measures. An [Islands Communities Screening Assessment](#) was completed for Bill proposals. The Circular Economy (Scotland) Bill, was introduced in June 2023, and contains provisions that require primary legislation to underpin Scotland's transition to a circular economy, and modernise Scotland's waste and recycling services. If passed, the Bill will primarily deliver new powers that will set a framework for taking action into the future. The direction and actions set out in this Route Map are complemented by the provisions in the Bill, and in some places are dependent on enabling powers created by the Bill if passed.

Methodology

An initial screening was carried out with Scottish Government and Zero Waste Scotland colleagues to identify a list of possible impacts which may apply to the strategic themes and associated measures when they are implemented in future.

To focus discussion and help align potential impacts with future measures, the workshop considered each strategic theme individually.

Following the workshop, desktop research was carried out to further investigate and gather existing evidence in relation to the proposals.

The findings of the workshop and desktop research informed the approach to engagement with island communities during the first consultation. This document has been updated following the analysis of the first public consultation responses.

It is important to stress that the Route Map is a strategic high-level document. Subsequent stages to develop its measures individually will be required to clarify the relevant policy detail to implement the commitments outlined.

This islands communities screening assessment, therefore, does not contain a detailed analysis of the possible impacts of each measure on island communities. However, where appropriate, subsequent development of measures will be subject to further impact assessments and associated consultations.

This updated screening assessment identifies a number of priorities for further analysis as well as areas where additional evidence-gathering is required as the detailed design of each relevant measure is developed. Detailed ICIAs will also provide opportunities for island communities, agencies, and businesses to highlight concerns or help maximise the benefits from any associated policies in future.

Key findings

Following an initial workshop, desktop research and screening process, several key issues were identified and highlighted within the first consultation process. The initial consultation respondents broadly agreed with the list set out in the first consultation document – while highlighting infrastructure as an additional issue for consideration. As such, the following areas may be directly or indirectly impacted:

- transport availability of disposal options and/or infrastructure
- availability of products and services
- employment and skills.

The section below highlights how these may be relevant for each of the strategic themes and associated measures.

Reduce and reuse

Reuse

Opportunities for increasing reuse in islands as a solution to reducing consumption of goods and packaging may be different for island communities. They could be more limited due to distance making collection inefficient or more expensive; infrastructure requirements for smaller quantities of arisings; or a reduced market for reusable items. Equally, if measures result in a reduction of waste being produced or if producers on islands that sell easily to the local community, then there are potentially more significant benefits on islands due to reduced waste and recycling costs or more effective localised business operations.

It is understood that Island Communities already experience a relative lack of choice in terms of access to goods and services when compared to other communities[1]. This is a result of a smaller number of shops in the local area, and the higher cost of deliveries to more remote parts of Scotland[2]. This may be relevant here and should be considered where appropriate when measures under this strategic theme are

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[1] Developing Scotland's Circular economy – proposals for legislation: analysis of responses (2020)
[2] Fairer Deliveries for All: an action plan, Scottish Government, 2018

taken forward. This is particularly important where specific products have a direct charge attached to them, but alternatives may not be available.

Measures that create employment and develop skills in the repair or refurbishment of products could bring additional benefit to island communities where availability of jobs is variable[3]. However, in the development of these measures, consideration should be given to whether opportunities may be more limited compared with other communities given the likely scale of potential operations.

Food waste

There is potential for redistribution of food to be more challenging in an island setting. The Scottish Government's six-fold urban rural classification (2016) classifies the islands as mainly remote rural, with remote small towns (see Figure 1)[4]. Those living in isolated rural areas have been found to be more vulnerable to food poverty,[5] and the cost of living is generally higher in island communities.[6]
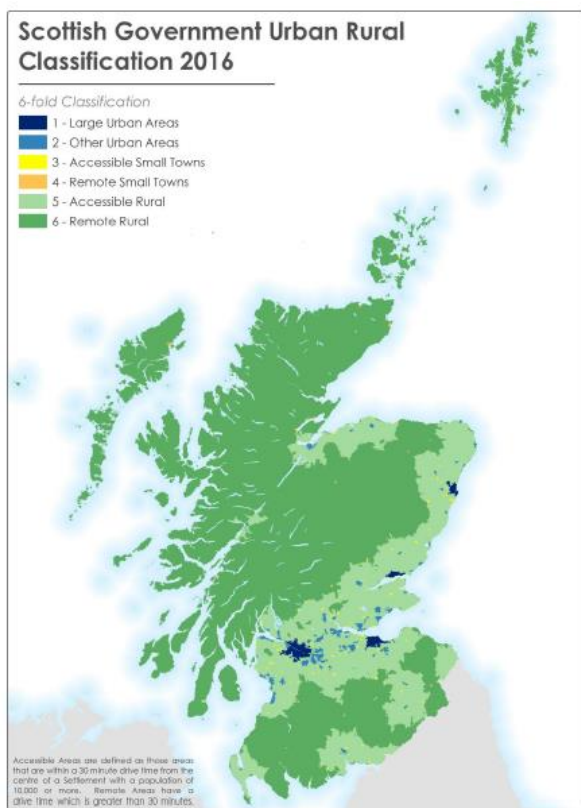

Figure 1 The Scottish Government six-fold urban rural classification, 2016. Source: Scottish Government urban rural classification 2016

Previous research has identified that remoteness can be a challenge both for businesses with surplus food to redistribute, and for community organisations trying to access surplus food, due to the distances involved[7]. Despite this, there are currently a range of redistribution mechanisms in place in island communities. These range from involvement with large-scale organisations such as FareShare, who

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[3] National Islands Plan Survey: final report - gov.scot (www.gov.scot)
[4] Scottish Government urban rural classification 2016
[5] The nature and extent of food poverty/insecurity in Scotland
[6] A minimum income standard for remote and rural Scotland
[7] Unpublished Zero Waste Scotland research

distribute food to charitable organisations, including some in the islands, to locally focused community initiatives such as community fridges and food share schemes.

For island businesses with surplus food, the key issue will be whether there are organisations that could make use of the food locally. This may be a challenge particularly in smaller island communities.

Any mandatory reporting requirements placed on businesses would apply to all businesses across Scotland, and so would not be an island-specific issue. However, island businesses may need to make more changes to their operations than those elsewhere to report on food waste, because they are exempt from segregated food waste collections under the rural exemption of the Waste (Scotland) Regulations[8]. Businesses would therefore need to implement a system for measuring their food waste, for example via representative sampling. However, this will apply to businesses in other parts of the country covered by the rural exemption, so is not unique to an island setting.

In addition, any extra time or cost burden would simply be aligning the islands with what businesses, from micro to large, that are not exempt from food waste separation requirements are already obliged to do.

Construction

Consideration should be given to the availability and affordability of transport which may lead to higher costs of construction on islands.

In addition, island communities may have potential issues with regards to supply chain and skills, with more limited access to sustainable construction products and services, reduced ability to follow demolition, screen, reprocessing and reuse of the resulting materials, and more limited availability and supply of workers. This was highlighted specifically in the Heat in Buildings Strategy ICIA but may impact other supply chains and skills in the construction sector. However, measures that create and develop skills in circular construction practices could also bring additional benefit to island communities.

Modernise recycling

Household recycling

Work undertaken for previous screening assessments under the Islands (Scotland) Act has identified that Island authorities often face higher costs per capita in collecting, transporting and disposing of waste and recycling[9]. This is, in part, due to rural nature of collections meaning they are less efficient: the Scottish Government Urban / Rural Classification[10] highlights that the majority of the island authorities have high proportions of their populations in very remote small towns and rural areas. Some islands do not have kerbside recycling service at present for this reason. Additional costs are incurred as waste and recycling must often be

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[8] The Waste (Scotland) Regulations 2012
[9] Reforming the UK packaging producer responsibility system, Partial island communities screening assessment, March 2021
[10] Scottish Government Urban Rural Classification 2016

transported off island for processing due to the limited number of operational landfill sites and other disposal facilities located on islands.

People living in island communities may face additional barriers to responsibly disposing of and recycling their waste due to the lack of facilities – this includes waste from a number of sources, including households, commercial properties and construction and demolition sites. Smaller local authorities, with less waste to market, may have greater difficulty negotiating with the private sector to invest in and establish new facilities, there is also a reduced ability to work with neighbouring authorities to share costs of these developments through waste partnerships. Many waste partnerships have been successfully developed by smaller authorities particularly for treatment and disposal in mainland Scotland and in the rest of the UK.

When developing measures that will address issues with household recycling it will be essential that the design processes account for island communities and to ensure as much consistency as possible across all areas. This should include the differing impacts for different islands[11], how changes in waste produced may be impacted by transportation issues such as cost but also disruption of ferry services due to high numbers of tourists or poor weather for example.

Business recycling

It is a common theme of Island Community Impact Assessments that there are unique challenges for island communities regarding the availability and affordability of transport. The higher costs of transportation may make it harder for island businesses to distribute and collect recycling. While market measure actions may be more limited due to the costs, infrastructure, distance travelled and feasibility on islands.

Consideration should be given to the challenges island businesses face during the development of measures that will impact them.

Decarbonise disposal

Impacts associated with costs of disposal are likely to vary between islands. Some islands have local access to a landfill or other residual waste treatment facility, all other waste must often be transported off island, often by ferry, for processing. This limits the facilities that are available to island communities as is shown by SEPA's Landfill Sector Plan[12] which identifies the locations of operational landfill sites in Scotland (see Figure 2**Error! Reference source not found.** below).

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[11] The National Islands Plan survey
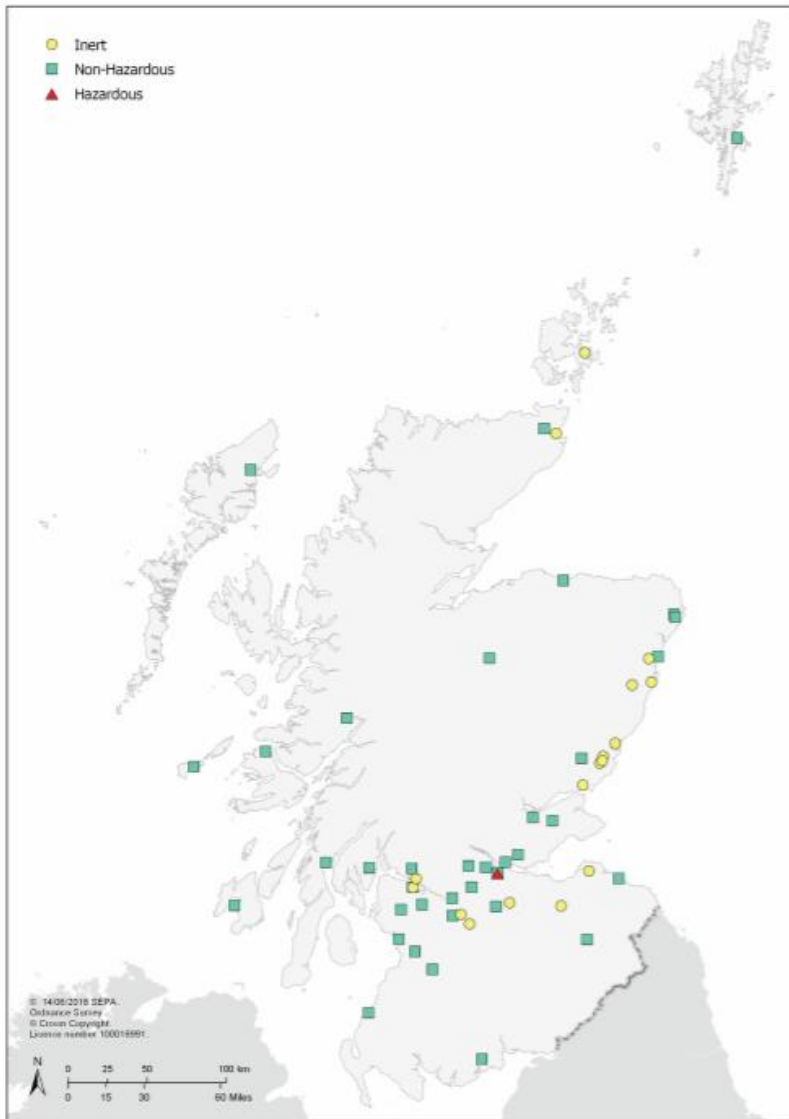[12] Landfill Sector Plan

Figure 2: Operational landfill sites in Scotland

Increased recycling rates or changes to segregation of waste may result in a different amount of space required on ferries. This impacts the costs associated with transport, particularly when multiple ferry journeys are required before waste arrives at its destination.

More limited options for disposal routes on islands has previously resulted in taking approaches that limit additional costs, for example creation of energy from waste facilities on Shetland.

Implementing measures further up the waste hierarchy to divert waste away from landfill may also be problematic due to increased transport costs and, for some materials, there are limited times that they are allowed on the ferries due to odour (or perceived odour) from the material.

Transportation logistics can be particularly challenging for difficult to recycle materials such as WEEE collections, end-of-life vehicles and construction materials. Recycling of farm plastics, for example, has two voluntary collection schemes and several waste collectors that will collect this material for processing; however,

storage, preparation for transportation, potentially low value of the material and high shipping costs can be prohibitively expensive in certain cases.

Gathering data

For each of the key issues identified during the workshop some data already exists and are outlined below. However, at this stage only overarching issues have been identified to begin the evidence gathering process. It is intended that further detailed assessment of the impacts and associated evidence is gathered at the point where the details of measures are developed. At this stage, further research should be considered to understand the gaps in data that exist.

i) Transport

The Scottish National Islands Plan Survey highlights that views on the reliability and availability of ferries varies between ages groups and between island subregions[11].

ii) Availability of disposal options and/or infrastructure

Waste and recycling data is available from island communities via their local authorities and is reported to SEPA on an annual basis using Waste Data Flow[13]. This data covers household waste and recycling collections, treatment, and disposal. This data shows that the majority of island authorities have recycling rates that are below the Scottish average, in some cases by a substantial margin[14] and kerbside recycling services are not universal in island communities.

There is, however, less data available on commercial and industrial waste. Data is key to understanding waste, recycling, and resource flows and to target necessary action and funding.

Shetland, Comhairle nan Eilean Siar and Orkney local authorities can provide specific waste management data relating to their island communities and this should be used when it comes to the design of specific measures. Highlands, Argyll & Bute and North Ayrshire local authorities may be less likely to be able to disaggregate data from island communities. This might also be the case for waste management companies, where they operate on islands. Efforts should be made to collect data specific to these island communities to better inform the detailed development of relevant measures.

The Scottish National Islands Plan Survey highlights the variability of views between subregions on access to recycling household waste and donating items for reuse[11]. This should be considered and explored further during the development of related measures.

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[13] https://www.sepa.org.uk/environment/waste/waste-data/
[14] Scottish Household waste – summary data 2019

Question/variable: (about your local area (within 3-4 miles of your home):) There is a local facility where I can donate things I no longer use
Comparison: All responses, and responses within subregions - Figures are weighted by age, gender and subregion.
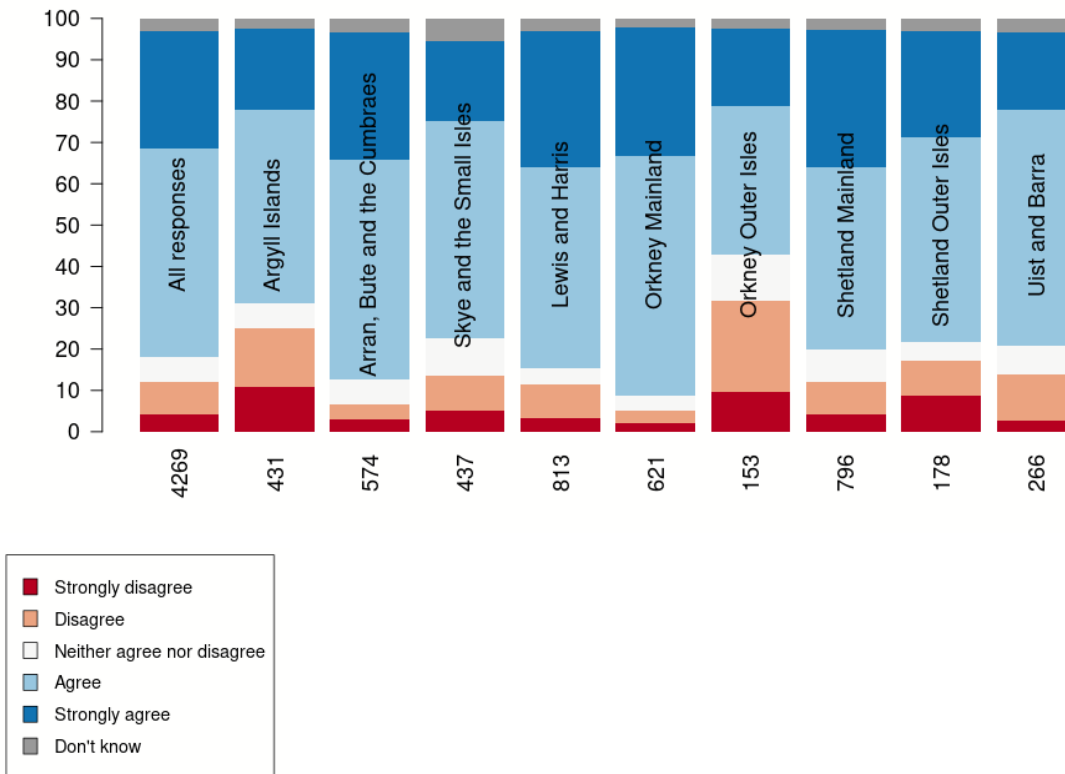Scale of bars = 100% of responses. Number of group responses shown beneath bars

Figure 3 Scottish National Islands Plan Survey (2020)

In research undertaken previously by Zero Waste Scotland[15] to better understand the costs of waste management, collection, and disposal in Scotland, all island authorities, with the exception of North Ayrshire, were included in the rural inaccessible category. North Ayrshire was included in the rural accessible classification because most of the population lives on the mainland, with the exception of Arran. The research indicated that for the rural inaccessible category, the annual cost per household of providing waste collections is substantially higher than the average cost in Scotland. Although these figures should be treated with caution as they are based on one year's data and calculating using a number of assumptions, they do indicate that there is an island premium in the cost to local authorities of managing household waste.

iii)   Availability of products and services

It is understood through research gathered for the Fairer parcel deliveries: action plan[16] that costs for delivery discriminates against those living in rural and remote areas, such as the islands. This can prevent island communities taking advantage of the digital economy and the products and services it provides. It is also noted that

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[15] Zero Waste Scotland, desk-based research
[16] Fairer parcel deliveries: action plan

this can be a barrier to small businesses, which further limits the availability for individuals as well as the economic potential of those locations.

The Islands Green Recovery Programme Refill Fund was part of the Scottish Government's £2 million programme to inspire locally led green projects on islands to recover from the coronavirus pandemic. The fund awarded over £250,000 to 20 organisations and businesses in island communities to gain funding to develop packaging-free shopping opportunities in the grocery retail sector. Findings and experience from this initiative will be important to consider as further measures in the Route Map are developed.

iv) Employment and skills

The National Islands Plan survey[3] provides an understanding of availability of job and training opportunities across the different island sub-regions. Further knowledge would be needed to understand how this would relate to any opportunities and challenges resulting from measures that affect employment and skills, and how these would differ from those experienced by communities elsewhere in Scotland.

Recommendation and conclusions

Given the publication of the Route Map itself will not result in impacts on island communities, this Island Communities Screening Assessment is an overview identifying broad likely impacts that should be considered in more detail, where appropriate, as measures are subsequently developed.

This ICIA has identified four key ways in which island communities may be impacted differently to other parts of Scotland as a result of implementing proposed measures. These are:

  i)   Transport
  ii)   Availability of disposal options and/or infrastructure
  iii) Availability of products and services
  iv)   Employment and skills

This high-level assessment has been updated following the initial public consultation.

We again seek the views of island communities during this second consultation, to ensure that we have, as far as possible, captured all potential overarching impacts which may apply to the measures set out in the Route Map.

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

Further, more detailed Island Community Impact Assessments will be carried out where appropriate when individual measures are designed and developed fully.

A full Islands Community Impact Assessment is NOT required

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Signature and date	21/12/2023
ICIA authorised by (we recommend DD level)	Katriona Carmichael
Position	Deputy Director, Circular Economy Division
Signature and date	Katriona Carmichael, 21/12/2023