1. The Community Resources Network Scotland (CRNS) represents recycling and re-use organisations across Scotland on issues of sustainable community resource management. Most members of CRNS are social enterprises managing waste resources at a local level through recycling, re-use, composting, waste reduction and waste education activities. They prevent tonnes of valuable product and materials from ending up in landfill, create local jobs and other economic opportunities, and typically work to help those on low incomes or who are disadvantaged.

Proportionate to the ability to pay
2. Third sector organisations such as charities and social enterprises use the funds they raise to contribute to the common good. CRNS members, in addition, contribute to the Scotland’s Zero Waste strategy. CRNS asks that the legislation take account of the unique position of CRNS members, and similar organisations, and either waive landfill tax and VAT, or credit them through tax allowances. For while CRNS members are actively engaged in waste reduction, re-use and recycling, inevitably like any business, they have to dispose of some residual operational waste and the cost of doing this represents a significant outlay.

Scottish Landfill Communities Fund
3. An opportunity for strategic investment. CRNS believes that the introduction of a replacement fund provides an opportunity for a strategic approach to increasing the capacity and sustainability of those elements of the third sector committed to environmental objectives – see paragraph 8.

4. Beyond the 10-mile rule. In recent years the number of operational landfills has reduced and therefore the old 10-mile rule would mean that very few communities could actually benefit from such a fund, and it would seem appropriate to open the fund to organisations outside the 10-mile radius of landfills. However, given the strategic objective to drive down the volume of waste going to landfill, the value of the potential fund must diminish over time. To open the fund to a wide range of environmental organisations outside the 10-mile radius will mean a thinner allocation of a diminishing fund. CRNS recommends that the replacement fund is targeted towards those organisations outside the 10-mile radius which are demonstrably active in addressing the waste hierarchy to the benefit of their communities; that is, those organisations involved in waste reduction, re-use, and recycling.

5. Red tape. The new fund should be clear in its objectives, transparent in its operation, and simple to access. Too many funds are burdened by bureaucracy making it difficult for volunteer-led organisations to access them and meet the, often onerous, demands. Perhaps small sums could be distributed using a fast-track approach.
6. **Administration fatigue.** It is noted that Section 20 states that ‘environmental bodies’, are approved by the Tax Authority. CRNS broadly welcomes this approach to ensure the proper allocation of public funds. However any approval process should not go beyond what is currently required from Scottish Charity and Registered Company regulations to avoid an additional administrative burden. Indeed it would be welcomed if the Tax Authority could tap into the information already held by OSCR to avoid duplication of administration processes.

7. **Geographical equity.** Section 20 implies that individual landfill operators could gift environmental bodies sums of money. Whilst this was appropriate under the old regime we believe the establishment of a fund to which all qualifying organisations might apply would be more appropriate. This would remove any potential geographical bias. (See paragraph 4.)

8. **CRNS considers that the introduction of a new communities fund is an opportunity for community resource management organisations to become self-sustaining, and in strategic terms, a way to fund a step change in attitudes to resource management.**

9. It believes that there might be two complementary objectives for the replacement fund:

- **Local/tactical:** fund organisations whose work embraces the waste hierarchy, in a fair and transparent way (see paragraphs 4-7) to develop and deliver local projects which will be to the benefit of the community.

- **Strategic:** fund the community resource management sector to develop and implement an accreditation/certification scheme, in alignment with zero waste regulations.

10. **The model CRNS has in mind will represent a strategic investment in the third/community sector by placing it in a self-funding position to influence and lead businesses in the sustainable use of resources.**

11. **Certificates will be awarded to businesses (initially from the SME sector) and third sector organisations which demonstrate commitment to and implementation of waste reduction, re-use and recycling in their business strategies and operations which both support and sustain employment and local communities as well as being economically sound.**

12. **The scheme will be self-funding with income streams from the validation/accreditation/certification process.**