Written submission from Richard Dryburgh, Changeworks

Changeworks Recycling is Scotland’s leading business waste and resource management company. We deliver a high quality recycling service that manages waste as a resource for 3000 business clients across the central belt of Scotland. As a ‘more than profit’ social enterprise, we feel it is our duty to respond to this consultation to help Scotland with its transformational move towards a low-carbon economy, particularly within the waste sector.

Overall

We welcome the publishing of the Climate Change Plan which includes many encouraging measures. We are heartened by the ambition of the Scottish Government in many sectors. However while waste appears a success story with significant emission reductions, we feel that this is a misrepresentation of the performance of the sector as a whole. For these reasons, our response will focus on Section 12 of the Plan, specifically business waste and resources.

Response

1. The policies and proposals within the Plan are considered realistic, however will only be achievable is they are applied and enforced. To date, the combination of an absence of strong leadership, lack of clarity around compliance of the Waste (Scotland) Regulations 2012, absence of enforcement, lack of reliable data, and effective lobbying by the waste management industry has resulted in the normalisation of a low quality recycling infrastructure and culture – where high quality recycling is the exception not the norm.

   Recycling rates have reached their peak and will not significantly increase from 2017 levels (within the commercial sector) given the current market and regulatory conditions. Recycling quality will continue to remain at an unacceptably low level. These scenarios will mean the Zero Waste Plan targets will be unachievable and this will have an impact on delivering Scotland’s ambitious climate change legislation.

2. The commendable fall in emissions from the waste sector to date has primarily been achieved through capture of the landfill gas emissions resulting from historical disposal of waste to landfill. This can be seen as the ‘low-hanging fruit’. If we were to look at a consumption based picture of Scotland’s emissions instead of a geographic one (as is included in the current targets) this would highlight that Scotland’s progress has been limited, with a throwaway culture still the norm.

3. There is significant confusion as to what constitutes as compliance with regards to the Waste (Scotland) Regulations amongst Scottish businesses. SEPA estimate 80% compliance, the City of Edinburgh Council estimate 40%. If compliance is qualified as high quality recycling, which was the ambition of the regulations, we would estimate <10% of businesses across Scotland fully comply. Mixed, ‘open-loop’ recycling, is a derogation of the regulations and this loophole has been exploited by both industry and businesses across Scotland halting Scotland’s progress to becoming a high quality recycling nation.
4. Whilst we welcome further enforcement of existing legislation and increase work on behaviour change in the waste sector, we do not believe this work will be sufficient to achieve our recycling targets. We need to address the infrastructure in order to address the normalised low quality, low capture status quo that we appear to now be in. We should look to European approaches such as in Austria and Germany, where source segregated recycling infrastructure and a high quality recycling culture has led to industry leading performance.

5. A key focus in the Plan is on removing food waste from landfill, which we would of course welcome as this will undoubtedly lead to a reduction in waste emissions. Ultimately it is hard to envisage how a ban on biodegradable waste from landfill will be enforced in practice.

6. The reliance on the waste management industry to voluntarily share data casts significant doubt on the accuracy of the current statistics. We are unclear as to what the current national recycling rate is. If we were to look at actual closed-loop recycling rates from reprocessors, we would estimate that our national recycling rate to be lower than currently indicated.

7. The benefits of a circular economy cut across environmental and economic priorities (e.g. resource scarcity, employment and other economic opportunities). However high quality material is critical if the circular economy is to become mainstreamed across our society and economy instead of being limited to small scale demonstration projects. The MRF Code of Practice and other attempts to measure, manage or control recyclate quality have been largely ineffective. SEPA’s attempts to control the quality of exports have simply led to export from English ports.

Our priorities to improve waste & recycling performance:

1. **Address Quality of Recycling.**
   Separate collections of recycling have to be enforced if Scotland is to become a high quality recycling nation that will achieve its targets. A tax on low quality recycling and a return to a meaningful increase in the landfill tax escalator would be positive steps. Clarification is required on what compliance with the Waste (Scotland) Regulations means for businesses.

2. **Focus on behaviour change.**
   Scotland still has a throwaway culture – only separate collections of recycling raise sufficient awareness of waste arising at source, and deliver transparency and accurate data. With this foundation, behavioural change can achieve purpose. A good example of a policy that would help achieve this type of behaviour change is a national deposit return system for drinks containers.

3. **Demonstrate leadership**
Separate collections must be a key priority for all public sector contracts. Our ambition to become a high quality recycling nation should not be compromised by the effective lobbying of the waste management industry.

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