

Agenda Item	6
Report No	CP/09/24

The Highland Council

Committee: Communities and Place

Date: 22 May 2024

Report Title: Waste Management Update

Report By: Assistant Chief Executive, Corporate

1. Purpose/Executive Summary

- 1.1 This report provides the Council's response to Scotland's draft Circular Economy and Waste Route Map to 2030 consultation which closed on 15 March 2024. The basis of the consultation is to set out strategic direction for delivering a system-wide, comprehensive vision of Scotland's circular economy from now to 2030.
- 1.2 In addition, the report provides updated information on the progress being achieved through the roll-out of service change to kerbside recycling, food waste and non-recycling collections, funded by the Scottish Government's Recycling Improvement Fund (RIF). The report provides further detail on the development of the waste transfer station in Fort William.

2. Recommendations

- 2.1 Members are asked to:
- i. **Note** the updated position on the service change project (RIF).
 - ii. **Homologate** the response to Scotland's draft Circular Economy and Waste Route Map to 2030: Consultation, as set out in Appendix 1 of the report.
 - iii. **Note** the updated position on Fort William Waste Transfer Station.

3. Implications

- 3.1 Resource:
- a. The Highland Council secured significant capital investment finance from the Scottish Government's Recycling Improvement Fund (RIF). The £6.55m award will support a range of improvements to the Council's waste and recycling performance.
 - b. The expansion of food waste collections will have a revenue implication, however the service changes are essential to achieving a sustainable collection service model. An overall forecasted positive position will be achieved through a reduction in costs associated with residual waste treatment and through improving the quality and quantity of recycling that we collect.

- 3.2 Legal:
- a. The Council's relevant legal obligations for waste collections are from the Environmental Protection Act 1990. Furthermore, the ongoing service change project regarding waste and recycling collections supports climate change legislation by reducing residual waste and improving the quality and quantity of recycling.
 - b. Proposals within Scotland's draft Circular Economy and Waste Route Map to 2030 provides additional powers and statutory responsibilities on Local Authorities. These are detailed in section 5 of this report.
- 3.3 Community (Equality, Poverty, Rural and Island):
The delivery of waste management services is undertaken in accord with Scottish Government legislation and takes community factors appropriately into account. A key aim of the service change project is to extend recycling opportunities to all, including rural areas.
- 3.4 Climate Change / Carbon Clever:
- a. The response to Scotland's draft Circular Economy and Waste Route Map to 2030 consultation will help shape Scotland's transition to a circular economy.
 - b. The update on the service change project detailed in this paper will contribute to more effective sustainable waste management practices in Highland. Reducing residual waste and increasing the quantity and quality of collected recycling will have positive climate/carbon impacts.
- 3.5 Risk:
Within the service change project there are a number of ongoing risks that require to be carefully managed for the successful delivery of the service transformation. Of particular importance will be:
1. An uninterrupted supply of procured wheeled bins.
 2. Householder and business engagement.
 3. Delivering infrastructure projects that are essential to support service change, these are:
 - Fort William Waste Transfer Station
 - Portree Waste Transfer Station
 - Improvement work to Seater Waste Transfer Station.
- 3.6 Health and Safety (risks arising from changes to plant, equipment, process, or people):
The safety of staff undertaking waste management duties is a statutory obligation for local authorities. The effective management of waste is essential to the health and safety of all householders and other service users.
- 3.7 Gaelic:
There are no Gaelic implications arising from this report.

4. Collection Service Change

- 4.1 Members will recall £6.55m has been awarded to the Council from the Scottish Government's Recycling Improvement Fund to enhance waste and recycling collections for communities across Highland.
- 4.2 The funding includes the provision of all the new non-recyclable waste bins to householders along with the expansion of the food waste collection service to another 30,000 households in the region. Modifications to the Portree and Caithness Waste

Transfer Stations to help support the changes to the recycling services are also included in the funding award from the Scottish Government.

- 4.3 The changes to waste and recycling collections are being implemented in a phased approach across Highland which commenced with Ross and Cromarty in April. The anticipated phased dates are:

Ross & Cromarty	April/May 2024
Nairn	May 2024
Inverness	May/June 2024
Badenoch & Strathspey	August 2024
Caithness	September 2024
Sutherland	October/November 2024
Skye & Lochalsh	February 2025
Lochaber	April/May 2025

- 4.4 Householders are provided a letter which informs them when their new, grey non-recyclable waste bin will arrive, when their current green bin will be converted into a mixed plastic and metal containers recycling bin and when their blue bin will be converted into a paper and cardboard recycling bin.
- 4.5 An information booklet titled “Your waste and recycling service is changing” is delivered with the new grey, non-recyclable waste bins and caddies. This booklet explains what is changing and how to use the recycling bins. The booklet also lists common items that cannot be put in the recycling bins. A new collection calendar is enclosed with the booklet and clearly shows the date to start presenting the new, grey non-recyclable waste bin and which bins to put out.
- 4.6 Service feedback from the early phase of service change has been very positive, householders are demonstrating a good understanding from the communications, of particular encouragement is a high level of participation in the new weekly food waste collections in the areas this is being provided. Progress will continue to be reported to this Committee.

5. Scotland's draft Circular Economy and Waste Route Map to 2030 - Consultation

- 5.1 Through the consultation, the Scottish Government set out proposals for a Circular Economy and Waste Route Map to 2030, the strategic plan is to deliver Scotland's sustainable resource and circular economy ambitions to 2030. An officer's response to the consultation, which required responses to be submitted by the 15 March 2024, can be found in Appendix 1 of this report.
- 5.2 It is recognised sustainable choices are still not the easy or routine choices for households and businesses. The Route Map is part of the Scottish Government's wider response to the challenge of achieving a fully circular economy. The delivery of the Circular Economy and Waste Route Map is a key commitment set out in the Scottish Programme for Government 2023-2024.

- 5.3 Measures in the Route Map are grouped under four strategic aims, which reflect the span of the waste hierarchy:
1. Reduce and reuse
 2. Modernise recycling
 3. Decarbonise disposal
 4. Strengthen the circular economy
- 5.4 One of the key objectives is to modernise household recycling and reuse services, improving and optimising performance. An identified priority action linked to this objective includes facilitating a co-design process for high quality, high performing household recycling and reuse services. Further actions include:
- Develop a statutory code of practice for household waste services.
 - Strengthen the Householder's duty of care in relation to waste.
 - Give local authorities more tools to support household recycling and reduce contamination.
 - Undertake a review of waste and recycling service charging.
 - Review the monitoring and reporting framework for local authority waste services.
 - Develop options and consult on the introduction of end destination public reporting of household recycling collected.
- 5.5 The Recycling Improvement Funded service changes represent a comprehensive package of measures which once implemented will deliver on the aims and ambitions set out within the Circular Economy Bill connected to delivering a high quality, high performing household recycling collection service, including the extension of food waste collections.

6. Fort William Waste Transfer Station

- 6.1 Highland Council's Waste Service is seeking to construct a waste transfer station on ground adjacent to the existing Household Waste Recycling Centre at Ben Nevis Industrial Estate. Planning permission for the development was approved by the South Planning Applications Committee on 12th December 2023.
- 6.2 Agreed Heads of Terms, a precursor for a long-term ground lease of the development site, were signed by the end February 2024.
- 6.3 Draft documentation conveying the details of a long-term ground lease offering have been issued to The Highland Council. The Council has provided its detailed response to the site owner's legal representatives and discussions are continuing.
- 6.4 Invitation to tender documentation is scheduled to be issued by The Highland Council via the Public Contracts Scotland portal by early June 2024. Tender returns are thereafter anticipated by mid-July 2024. An agreed and signed long-term ground lease is required before a construction contract could be awarded by The Highland Council.
- 6.5 Whilst the Fort William transfer station would not be funded through the Recycling Improvement Fund award (it is funded through the Council's capital programme), the rollout of new collection services in Lochaber (scheduled for April/May 2025) is

dependent upon a suitable transfer station being in place to receive the separate deliveries of general waste and recyclable materials.

- 6.6 Any material delays in finalising the long-term lease or in the subsequent construction programme will place considerable pressure on the timescale for successfully delivering the waste transfer station in readiness for April/May 2025.
- 6.7 The long-term lease for the Fort William Household Waste Recycling Centre was signed and secured during March 2024.

Designation: Assistant Chief Executive, Corporate

Date: 07 May 2024

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Appendices: Appendix 1: Circular Economy and Waste Route Map to 2030:
Consultation response

Appendix 1

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

Part A : Reduce and reuse

1 To what extent do you agree with the priority actions proposed within the Reduce and Reuse strategic aim? Please provide evidence to support your answer if possible:

Neither agree nor disagree

Highland Council Officers agrees with the general scope of the presented priority actions set out under Reduce and Reuse. The scope of these activities, however, is vast, with each requiring considerable resource, stakeholder buy-in, time and attention. Although the measures seem wholistic, comprehensive and ambitious, the information provided lacks specific detail on how each measure will be enacted, who will be responsible in taking it forward, and the steps and realistic timescales in which to achieve this. Within the consultation there is insufficient detail around the delivery of the required actions and overall appears to be a lack of strategic links between the targets dates and ambitions for the actions. There is a lack of clear costed delivery plan to outline how any measures will be implemented within Scotland and this will form critical requirements for the Routemap.

For the development of any Plan we would benefit from having sight of how this will be pulled together, in order to provide confidence that the measure is likely to be effectively and successfully delivered and on time. Aspiring to whole system reform, will involve challenging powerful forces of production, consumption and international economics. It seems particularly ambitious that a comprehensive formulation of plans and approaches will be adequately mapped and next steps agreed upon by 2025/26. We view the listed measures as evolving and being built on over time, therefore each of the measures must include the necessary flexibility to respond to new developments and information. With the commencement of the drafting of the Route Map in 2021, the lapse in time from then to now should be reflected in the timescales applied to the priority proposals. Given Scotland's consistent recent history of not reaching somewhat arbitrary targets and dates, the detail behind plans should be made transparent to ensure these are taken seriously and achieve the necessary buy-in. The ambition to involve key stakeholders and influences in the development of measures and approaches is important, however, clear, firm and guiding central leadership is absolutely critical, and in no way should the measures be left for the sector to coordinate.

SECTION 2: REDUCE FOOD WASTE, Highland Council Officers welcomes the intention to deliver an intervention plan to guide long-term work on household food waste reduction behaviour change, within a realistic and achievable timescale. We agree that the worsening trends on food waste production require a collective reset of our approach to tackling food waste, as part of wider, cross-government food policy. We support the need to test behaviour interventions at a range of decision-making stages to identify what can be done to generate the greatest impacts at a household-level. Local Authorities wish to see a clear focus on normalising food waste recycling behaviours at a householder level, recognising that sustained participation is challenging to maintain. We would wish to see an investment in the resource-base at a local authority level to undertake presentation studies and kerbside intervention activities.

SECTION 3: EMBED CIRCULAR CONSTRUCTION PROCESSES, Highland Council Officers would welcome the diversion of DIY and construction materials from HWRCs to an appropriate alternative arrangement. We do however foresee significant challenges in the ambition to develop regional hubs and networks for the reuse of construction materials. Securing appropriate sites, licensing matters and

control of activities on these sites would present feasibility and practical challenges. Relevant bodies within the construction sector would have to be made responsible for delivering on this ambition. The enormity of the task and investment would need to be proportionate to the likely outcomes.

2 To what extent do you agree with the further actions to 2030 listed across the Reduce and Reuse strategic aim? Please provide evidence to support your answer if possible:

Neither agree nor disagree

Highland Council Officers welcome the expansion of environmental charges to include single-use disposable cups. This particular measure we consider as being overdue and continues to be a distraction from potentially more impactful areas of focus. We recognise that the introduction of a charge on single-use disposable cups should be leveraged to build public awareness of wider drivers for change needed to consumption habits. Highland Council Officers are pleased to see the recent developments on a move to place restrictions on the supply and sale or prohibition of single use vapes. For the waste sector progress in this area needs to move at pace, in response to both the widely reported impacts to the health of our young people and the risks to our essential infrastructure and colleagues from the fire hazards posed within the waste management chain. Highland Council Officers welcome a wide review of the support needed to grow and normalise the reuse sector in Scotland.

Levers within enhanced Extended Producer Responsibility schemes should be used to raise the consistency and profile of reuse activities delivered across Scotland. Drivers and levers should create opportunities for communities and third sector organisation, and not produce unintended consequences which could risk displacing them. From our broad experience, we would warn against the inclination to use single case studies of effectively delivered reuse projects, which are unlikely to be replicated as they are elsewhere, due to the uniqueness of context and timing in which these projects tend to arise. What we see as being required is greater consistency across Scotland in the consistency of a broad range of measures to create the conditions necessary in which reuse schemes and projects are likely to get off the ground and to remain sustainable for the long-term. We support the ambition to create reuse hubs to normalise reuse and integrate online reuse, skills and training, and collaboration with the wide range of existing public and private repair and reuse offerings. It is not clear within the information provided, what effective steps will be taken to undertake a major channel-shift of public behaviours to normalise the use of reuse and repair services.

In addition, it is not transparent to us how widely known and effective Revolve Accreditation is. We consider the potential for setting reuse targets as forming just part of the wider review of reuse activities in Scotland. Within the information provided it is acknowledged that before developing a reuse target, we would need to have a robust mechanism in place to monitor reuse. Given the scale of the informal reuse economy in Scotland, we are unclear on how a reliable baseline can be formed to measure these activities in the traditional way that we do for secondary resources. The ability to set meaningful reuse targets should not get in the way of the need to enhance all aspects of support for the reuse sectors to enable partners to deliver more environmental benefit and social value. Highland Council Officers strongly welcome the intention to deliver behaviour change-based approaches focused on sustainable consumption but wishes to understand in greater detail the funding and resource commitment that will sit behind these endeavours, to ensure they are delivered at scale enough to be impactful and become embedded as business as usual.

SECTION 2: REDUCE FOOD WASTE, Highland

Council Officers support the need to strengthen data and evidence around food waste throughout the production and consumption chain. In particular, we would wish to see regular funding and resource support for presentation studies and Waste Compositional Analysis activities at a local government level. Highland Council Officers would have concerns about undertaking a review of the rural exemption for food waste recycling, as part of the recycling co-design process. Although the question of the exemption requires to be resolved and put to rest, work undertaken by ZWS and Eunomia with SLAs as part of options appraisals has already largely addressed the question of how far to reasonably extend household food waste collection services. This question feeds into the wider issue of geographic gaps in accessible infrastructure development across Scotland, which make further expansion in Highland in particular, non-viable. Highland Council Officers accept the need for enhanced support for businesses. However, with large numbers of food producing businesses failing to meet their legal duties to recycle food waste, investment in effective enforcement measures should be a priority. Efforts alone to engage food businesses on a voluntary basis to introduce food waste reduction activities is on its own deeply inadequate.

Part A: Modernise recycling.

3 To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

Neither agree nor disagree

Please provide evidence to support your answer if possible:

Highland Council Officers wishes to express concern regarding the intention to apply co-design principles to the development of household recycling and reuse services. Although we respect the intention to focus on collaboration to achieve better outcomes locally for individuals and communities, local authority officers are the most informed technical experts in this arena, able to understand the many complexities at play, including operational and budget considerations. We would be concerned about the ability of a co-design process to manage expectations of the stakeholders participating in these processes, about the ability for negotiations and discussions to delay or derail important improvements required, and of the potential for hijacking local decision-making processes. We do however recognise that too much focus is often placed upfront on the collection of materials with little understanding on how this material should be presented to the market for optimal and efficient processing, recycling or treatment. As such, closer engagement and input from treatment operators would be valuable as part of whole system design. Highland Council Officers will not be alone in stating concern for the observed inconsistent and insufficient waste strategy staffing within SLAs. With significant cuts to local authority funding, and erosion of Council resources, we foresee significant gaps in replacing technical experts and growing new talent, as older colleagues retire. Should the Scottish Government wish to apply co-design principles to the development of recycling services, it must be the case that SLAs are adequately resourced to take a leading role within this space. Highland Council Officers recognise that a large body of work has been undertaken by ZWS and Eunomia in undertaking options appraisals to determine the best way forward for the design of the suitable local kerbside collection systems, including a focus on reduced residual waste capacity or frequency of service. Many SLAs have delivered on these commitments with support from the Recycling Improvement Fund or even earlier, therefore, we seek to understand how a co-design process could add further value in this area as we would not wish to see duplication of this effort.

Highland Council Officers agree that the revised Code of Practice should be put on a statutory footing to provide a clear strategic direction for household recycling. This process should build on the existing voluntary Code of Practice in order to strengthen it, and most importantly ensuring an understanding that a 'one size fits all' approach is neither desirable or possible. Any additional requirements stemming from new statutory obligations must be thoroughly costed, with local authorities appropriately remunerated for increased costs. Highland Council Officers see the design of local reuse and recycling service provision as inextricably linked to infrastructure investment on Council sites and within private sector treatment facilities. We see that where the application of co-design principles could perhaps deliver the greatest benefit is actively involving the relevant stakeholders in these discussions (i.e., planning policy, investors, funders). Highland Council Officers are concerned about introducing statutory targets without clearly understanding necessary service adjustments. Financial incentives for local authorities are crucial to effectively support statutory targets, considering ongoing financial pressures. As new statutory targets will necessitate legislative changes and impose additional legal burdens on councils, full funding is essential to enable compliance with any new duties. A nuanced approach is needed for setting and comparing recycling targets, considering regional variations and the diverse starting points. We would be concerned that financial penalties may exacerbate existing disparities and both targets and penalties may compete with obligations under packaging EPR to demonstrate efficient and effective service design. Highland Council Officers support the proposal to strengthen Householder's duty of care in relation to household waste. However, the ability to make effective use of these new powers will only be possible through the provision of additional resource at a local government level in order to undertake the investigations and administration processes to identify and enforce potential breaches of this duty. Highland Council Officers support undertaking a review of waste and recycling service charging within a realistic timescale. This would be only where the recommendations of that review factor in all associated costs relating to existing essential income raised through the opt in purchase or garden waste recycling permits, or cost avoidance for areas within SLAs or whole SLAs who do not currently provide garden waste collections. As a point to note in the information provided in the consultation, the review of charges for garden waste services should be treated entirely independently of any financial incentives generated through Packaging EPR. Highland Council Officers support a review into the monitoring and reporting framework for local authority waste services. Existing reporting regimes represent a considerable recurring body of work for SLAs, along with other internal performance monitoring functions. Any additional resourcing within Government or their supporting bodies to undertake such a review, must be matched with an equivalent available resource within SLAs, who will be essential for feeding into such a review.

Currently within the Highland Council we have no such available capacity to undertake this work. While officers support the intentions of the Digital Waste Tracking Service initiative, we have previously raised to SEPA the significant gap between the intention, and the very real limitations on the ground in terms of a lack of infrastructure across Highland to make this possible across all sites. The lack of power or internet at some current sites present very real limitations to this rollout, along with there being no available capital to rectify this. In addition, any wholesale review must also include whether weight-based measures are appropriate for the future. Highland Council Officers do not agree with the proposal to introduce a requirement for local authorities to report publicly on end destination of household recycling collected. Although service users are increasingly seeking greater transparency on the recycling journey, the ability for Local Authorities to track the chain of custody of materials once they move beyond the primary appointed treatment provider is highly limited. As treatment facilities amalgamate outputs of other LA and commercial feedstock, it becomes increasingly difficult to track how materials move.

The reporting of end destination information should instead fall to treatment providers and to the regulator, who hold and record this information as part of their existing legal duties. The expectations of service users would be difficult to manage where this information is reported in the public domain, due to changing nature of off-take locations often within short spaces of time, and the likely inability to pinpoint the final destinations of specific geographic inputs.

SECTION 2: COMMERCIAL RECYCLING,

Highland Council Officers agree with the need to undertake a review of compliance with current commercial recycling requirements in Scotland. The timescales allocated to this measure to begin in 2024, and will report its findings by the end of 2025, appear highly ambitious. We strongly acknowledge there is a need to undertake an updated review to look at current compliance with the statutory requirements by businesses, and the underlying reasons or barriers to compliance. Highland Council Officers would be seeking greater detail on the intention to undertake co-design measures to improve commercial waste service provisions that drive waste prevention, reuse and maximise recycling. Most commercial waste collectors operate in a highly competitive environment, which has the potential to make co-design with stakeholder engagement extremely difficult. Commercial waste collectors will not be subject to the new statutory duties under the Household Code of Practice, therefore, may have the unfair advantage of continuing to deliver less effective co-mingled collection services that appeal to time poor businesses. Private sector waste collectors do though deliver essential services to Scottish businesses, many of which are SMEs. We must be mindful of imposing additional complex requirements particularly on to SMEs, which could threaten their viability, resulting in a default of service obligations to SLAs.

4 To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

Agree

Highland Council Officers welcome the intention to undertake Waste Compositional Analysis on commercial recycling material, but also recognise the challenges in identifying patterns within what is a non-homogenous material stream. Colleagues across the sector have for some time highlighted this gap in available data sets. Insights into commercial recycling should be used to target behaviours and engagement with services. Highland Council Officers emphasise the necessity to shift responsibility from local authorities to producers when it comes to the feasibility of encouraging reuse and repair. We advocate placing the impetus for driving reuse initiatives on producers, who have the potential to support and financially contribute to enhancing items' reusability or reparability. In Scotland, local authorities, particularly those in peripheral areas, face challenges related to operational scale and infrastructure requirements, hindering their ability to facilitate more reuse. The underlying concern is that local authorities have limited influence over what is produced and the availability of outlets for materials. The responsibility lies with producers, distributors, businesses, and retailers.

Part A: Decarbonise disposal

5 To what extent do you agree with the priority actions proposed within the Decarbonise Disposal strategic aim? Please provide evidence to support your answer if possible.

Agree

Highland Council Officers support the proposal to establish a Residual Waste Advisory Panel to oversee the development of a Residual Waste Plan to 2045 and the development of a Sector-Led Plan to minimise the Carbon Impacts of Energy from Waste. From the information supplied, we require more

specific detail on how the Residual Waste Plan will be enacted, who will be responsible in taking each step forward, and realistic timescales in which to achieve this. Highland Council Officers agree there has been an absence of strategic approach to residual waste infrastructure development in Scotland, which will present significant challenges when attempting to achieve de-carbonisation of residual waste treatment processes, in retrospect. Investors in particular have vocalised their concerns quite clearly on the lack of strategic oversight in Scotland for waste infrastructure development, which has created a challenging climate for them to secure the necessary investment. Local authorities in particular have little influence on the location of key infrastructure developments, or for the marrying up of heat-offtake solutions to appropriate projects. There has in our view been a lack of oversight a blueprint for residual waste infrastructure development to-date, both in terms of ensuring a joined-up approach through the national planning framework and in regulatory oversight of the big picture. The majority of Energy from Waste facilities in Scotland do not have co-located frontend pre-treatment facilities, and retrofitting these would prove challenging or impossible. Should pre-treatment become a requirement, this would result in considerable double-handling of material across the country, higher treatment costs and greater vehicle emissions. If the aim is to remove fossil-plastics from the residual waste stream, we are of the clear view that significant focus and resource should be placed on upstream opportunities, in terms of 1) yielding the opportunities from Packaging EPR allowances paid to LAs to cover the full costs of collections of all plastic packaging types, 2) a review of the benefits of Direct Variable Charging (Pay as you Throw), and 3) also the strategic development and support of off-take markets and appropriate infrastructure within Scotland to manage flexibles and films in a way which would ensure their inclusion in collection system can be sustainable.

6 To what extent do you agree with the further actions to 2030 listed across the Decarbonise Disposal strategic aim? Please provide evidence to support your answer if possible.

Neither agree nor disagree

Highland Council Officers recognise the need to move away from purely weight-based measures alone, to incorporate greater insight into the carrying environmental carbon and environmental impacts of materials. Essential to this will be developing enhanced data sets on residual waste arisings in Scotland, to cover significant gaps which have been highlighted by sector specialists. Highland Council Officers are concerned about the costs that will be incurred to Local Authorities from the Emissions Trading Scheme and as such the value of this tax. We question the effectiveness of such a tax which will be passed directly from treatment providers to Local Authorities, who have 1) limited influence on upstream measures and investments which would see the removal of fossil-plastics from waste streams, 2) no influence on the funding necessary coming from Packaging EPR and other producer responsibility schemes required, or 3) influence on recyclability considerations in packaging design, in order to achieve carbon reductions. In addition, it should be recognised that for rural local authorities at considerable distance to residual waste treatment facilities, these Councils already pay the penalty of unavoidable considerably higher haulage costs. This issue links quite clearly to infrastructure development and future national Energy from Waste capacity. Highland Council Officers are of the view that an Emissions Trading Scheme will only deliver on its objectives where implementation of relevant policies contained elsewhere in the routemap (and at the UK level, the Resources & Waste Strategy) are also achieved at the necessary intervals. Within the Sector-Led Plan to minimise Carbon Impacts of Energy from Waste, we would wish to see further detail on any other additional fiscal measures which would be considered as part of this review to support policies that could be introduced to reduce the carbon emissions associated with disposal further.

In particular, if multiple incentives are to be introduced, we would wish to understand the detail behind how these would be complementary, or to identify potential unintended consequences. Highland

Council Officers are concerned about the potential loss of most landfill capacity in Scotland, and what this means for dealing with C&I material exempt from the Landfill Ban, which is unsuitable for shredding and sending to Energy from Waste. An appropriate level of landfill capacity must be maintained across Scotland into the future. The Highland Council will respond to any call for evidence in 2024 seeking to understand these problematic waste streams, in particular we will draw attention to large volumes of marine waste brought to land from fishing activities around the Highlands. Highland Council Officers will be pleased to actively engage in the co-production of guidelines for effective community engagement. Local Authority officers have significant experience in designing and delivering effective public outreach and waste awareness campaigning to our communities and would have much to contribute to this important work. We strongly encourage the need for a joined-up approach and consistent public messaging across Scotland. Highland Council Officers support in principle the intention to extend the landfill gas capture programme to increase the number of sites undertaking investigative or development work by 2025/26 to increase the amount of landfill gas captured of closed landfill sites. We would wish to see a reasoned approach to where such investment is best to be made in regards to the return on investment, and also full funding support for local authority sites which may fall within any new regime.

Part A: Strengthen the circular economy

7 To what extent do you agree with the priority actions proposed within the Strengthen the Circular Economy strategic aim? Please provide evidence to support your answer if possible.

Agree

Highland Council Officers broadly agrees with the priority actions provided the CE plans are linked to the wider recycling, product stewardship and residual action plans however the Routemap provides no detail or clear direction of travel to allow a considered view to be made.

8 To what extent do you agree with the further actions to 2030 listed across the Strengthen the Circular Economy strategic aim? Please provide evidence to support your answer if possible.

Agree

Highland Council Officers believe that empirical data will help drive decision making therefore, we would support all measures aimed at standardising data collection, reporting and harmonising digitisation initiatives. We note that public data is held by SEPA, ZWS and other agencies but the time lag for its release and or transparency around the use of the data is often flawed and does not support objective peer review of findings. Highland Council Officers agrees with all measure aimed at supporting training, education and development of skills within the sector and is a strong advocate for the opportunities within the industry. CIWM Scotland notes that the current financial support for training however are limited and need to be clear links at Government level to help deliver long term change.