



## ACS Submission – Developing Scotland’s Circular Economy

### Environmental charging for items such as single-use disposable beverages

1. Do you agree in principle that Scottish Ministers should have the power to set charges for environmentally harmful items, for example single-use disposable beverage cups?

No.

2. Do you agree with the proposal to prioritise introduction of charges for single-use disposable beverage cups?

No.

3. Are there any other items that these new powers for environmental charging should be applied to in the future?

No.

### Mandatory reporting of waste and unwanted surplus

4. To strengthen monitoring, measurement and reporting of waste across all sectors, do you agree with the principle that Scottish Ministers should have the power to require mandatory public reporting of:

I – business waste? No.

II – business surplus? No.

5. Do you agree with the proposal to prioritise introduction of mandatory public reporting for businesses of:

I – food waste? No.

II – food surplus? No.

### Business Regulatory Impact Assessment

17. Taking into account the accompanying BRIA, do you think that the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any business or sector? Please specify.

The BRIA for these proposals does not provide the costs and burdens on business or sectors. The Scottish Government should provide this information before laying regulations giving power to the Scottish Ministers so the impact on business can be fully understood rather than consulting once Scottish Ministers have been given the powers proposed in the consultation.

### **Increasing the minimum single-use carrier bag charge from 5p to 10p**

20. Do you agree with the proposal to increase the minimum charge on single-use carrier bags from 5p to 10p?

Neither agree nor disagree.

21. Do you agree that the initial 5p minimum charge on single-use carrier bags has had a positive impact on the environment?

Yes.

### **Additional Comments**

22. Do you have any other comments that you would like to make, relevant to the subject of this consultation that you have not covered in your answers to other questions?

#### *Environmental charging for items such as single-use disposable beverage cups*

We do not agree that environmental charging for single-use items such as disposable beverage cups should be introduced. As stated in the Scottish Government's consultation, the environmental charge would be applied to products that are harmful to the environment and problematic to recycle. As such, we believe that the Scottish Government should look at ways to increase the recyclability of these products rather than imposing a charge which will not tackle the initial problem identified. Moreover, a charge applied to these products may not be as effective as the carrier bag charge as consumers' use of these products are different. For example, purchases of beverages may not be a planned purchase, the consumer may not own or be carrying a reusable beverage cup and therefore not be able to avoid the charge.

Specifically looking at beverage cups, the use of coffee machines in convenience stores continues to grow. Currently, 27% of convenience stores in Scotland offer customer operated coffee machines and 14% of convenience stores in Scotland offer staff operated machines<sup>1</sup>. As such, we are supportive of the work of the Paper Cup Recovery and Recycling Group, which was set up in 2014 to bring together businesses, recyclers, suppliers and the public to increase the recovery and recycling of paper cups. The group focuses on: conducting research and identifying ways to improve the sustainability of the paper cup supply chain; identifying solutions which sees paper cups collected alongside other paper and card products through existing recycling collections; developing consistent message and educating involved parties on material value and recyclability; and engaging with stakeholders to understand and addressing risks association with the environmental

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<sup>1</sup> ACS Local Shop Report 2019

impacts of paper cups. More of the work of the Paper Cup Recovery and Recycling Group to increase the recovery and recycling of paper cups can be found on their website<sup>2</sup>.

We are supportive of proactive work from industry to increase the recycling of coffee cups. As well as being supportive of work from Paper Cup Recovery and Recycling, we are also supportive of individual schemes from coffee retailers including cash incentives to use reusable cups in-store and the launch of in-store cup recycling schemes. We believe it is voluntary industry action rather than government regulation which will lead to innovative recycling of coffee cups and encourage the Scottish Government to explore how it can work with the industry to encourage further innovations.

### *Mandatory reporting of waste and unwanted surplus*

The convenience sector is complex, there is a significant variety in the products offered in different types of store, depending on their size, location and ownership type. As such, the amount of food waste produced by a convenience store will also be dependent on these factors. For example, in a survey of 1,210 independent retailers, 41% respondents said their store sells more fruit and vegetables than it did five years ago, while 35% responded that they did not stock fruit and vegetables in their store<sup>3</sup>. A retailer who does not stock fruit and vegetables will most likely produce less food waste than a retailer who does. This is evident by a survey of independent convenience retailers which found 36% of independent retailers responded that their store does not generate any food waste<sup>4</sup>.

ACS does not believe there is a need for legislative action, such as requirements to report food waste and surplus, in order to prevent food waste. Retailers are already being proactive and looking at reducing their food waste through various ways, including increasing consideration given to stock ordering processes to prevent food waste, engaging with local and national charities and using “reduced to clear” lines to donate any food waste produced. Retailers are already taking proactive action to reduce the amount of food waste they produce, in ACS’ Voice of Local Shops survey of 1,210 independent retailers, 20% responded that they recycle using a separate food waste bin, 12% consume or give to staff, 10% reduce food waste through other initiatives, and 7% donate to a local cause<sup>5</sup>. It is evident that retailers take a variety of measures to reduce food waste in their stores.

Mandatory reporting requirements about food waste could also place a disproportionate burden on smaller retailers. The Scottish Government must also take into consideration that smaller retailers will not have resources at a head office to fulfil reporting obligations, it will be the retailers themselves that would be required to report if they are obligated. 20% of shop owners in Scotland work more than 70 hours per week, 16% take no holiday per year, and 47% of their employees work less than 16 hours a week<sup>6</sup>. Therefore, it would also be challenging for an independent convenience retailer to have the time (as well as resources) to record food waste data.

If the Scottish Government are to introduce a requirement to report food waste and unwanted food surplus, we believe that this requirement should have a de minimis threshold

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<sup>2</sup>[http://www.pcrgrg.uk/uploads/3/1/9/1/31915573/pcrrg\\_response\\_to\\_eac\\_inquiry\\_on\\_coffee\\_cups\\_and\\_plastic\\_bottles\\_gr.pdf](http://www.pcrgrg.uk/uploads/3/1/9/1/31915573/pcrrg_response_to_eac_inquiry_on_coffee_cups_and_plastic_bottles_gr.pdf)

<sup>3</sup> ACS Voice of Local Shops Survey 2016

<sup>4</sup> ACS Voice of Local Shops Survey August 2016

<sup>5</sup> ACS Voice of Local Shops Survey August 2016

<sup>6</sup> ACS Local Shop Report 2019

which would only obligated businesses which generate more than 5kg/week of food waste to report. This would be consistent with the Scottish Government's current minimum threshold for food businesses to have a separate collection for food waste. Not only would it reduce the impact of the reporting requirements on small businesses which would not meet the threshold, but it would also act as an incentive for larger businesses to reduce their food waste and unwanted food surplus.

#### *Increasing the minimum single-use carrier bag charge from 5p to 10p*

Since its introduction in October 2014, the single-use plastic bag charge has been effective in reducing the number of single-use plastic bags in circulation. As such, we do not have a strong view on whether the charge should be increased given that the existing 5p charge has successfully changed consumer behaviour.

To support the Scottish Government's thinking on increasing the single-use carrier bag charge, we would like to see the Scottish Government consider views of consumers, therefore we commissioned polling of 1,100 UK consumers (including 98 consumers from Scotland) by Populus. The consumer polling found that 56% of consumers in the UK supported an increase in the price of single-use plastic bags from 5p to 10p, 27% were opposed to an increase, and the remaining responded neither support or oppose or didn't know<sup>7</sup>. Looking at Scottish consumers, 53% supported an increase in the charge, 28% opposed an increase, and the remaining responded neither support or oppose or didn't know.

Those who buy single-use plastic bags were then asked about whether the increase in price would change their behaviour. Of those who said they use single-use bags (46% of the sample), 41% responded that they would buy fewer single-use plastic bags and use the bags they already own, 26% would buy fewer single-use plastic bags and buy more bags for life, and 26% responded that it would not change their behaviour<sup>8</sup>. The Scottish Government must carefully consider the impact that an increase to the carrier bag charge will have on customers compared with the increase in behaviour changes already delivered by a 5p charge.

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<sup>7</sup> Populus Consumer Polling February 2019 (when asked: Would you support or oppose increasing the price of single-use plastic bags from 5p to 10p?)

<sup>8</sup> Populus Consumer Polling February 2019