

## Response ID ANON-EPBD-HX1M-S

Submitted to Delivering Scotland's circular economy: A Route Map to 2025 and beyond  
Submitted on 2022-08-18 09:32:10

### Package 1: Promote responsible consumption, production and re-use

1 To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use?

Strongly agree

Supporting evidence:

The Salvation Army welcomes the proposed route map and applauds its ambition. The Scottish government is to be congratulated for its leading work in the area of the circular economy and for the measures promoted in the route map.

As the UK's leading textile recycling and clothing collection company, the Salvation Army Trading Company Ltd (henceforth: SATCoL) provides around 8,000 clothing collection banks across the UK, with a significant presence across Scotland. We collect over 60,000 tonnes of clothing each year and provide solutions for textiles and other products and packaging, including new Deposit Return Scheme collections.

SATCoL also operates over 230 charity shops and donation centres in which we sell collected donated clothing, furniture, home products, books, electrical items, and corporate donated items.

Over the last 10 years, the profits we receive from the sale of donated items have contributed over £70 million to funding The Salvation Army's social welfare work in communities throughout the UK and the Republic of Ireland.

2 Are there any further measures that you would like to see included in the Route Map to promote responsible consumption, production and re-use?

Further measures to include:

The Salvation Army's SATCoL charity shops see the impact of fast fashion, EEE and cheap toys and are therefore pleased to see that the Scottish government is seeking to take powers to set statutory consumption reduction targets. The plans to encourage design for repair and making repair easier are also very welcome. In addition, we would call for repair skills training to be included as a key part of the primary and secondary curriculum.

The Salvation Army supports the introduction of textiles EPR to support the sorting and recycling infrastructure in the UK, increasing post-consumer recycled textile content in garments and increased durability of garments. Over recent years we have seen a significant reduction in the quality of the clothing we collect. The Salvation Army's charity shop network (SATCoL) is working with partners to trial new fibre sorting technology to sort and recycle post-consumer textile waste.

Businesses have a key role to play and should be held to account. The Salvation Army would like to see the introduction of mandatory reporting on supply chain emissions from purchased goods and services (scope 3), as well as the introduction of an agreed standard for supply chain emissions reporting.

### Package 2: Reduce food waste

3 To what extent do you agree with the measures proposed in this package to reduce food waste?

Neither agree or disagree

Supporting evidence:

The Salvation Army has no comment to make regarding this question.

4 Are there any further measures that you would like to see included in the Route Map to reduce food waste?

Further measures to include::

The Salvation Army has no comment to make regarding this question.

### Package 3: Improve recycling from households

5 To what extent do you agree with the measures proposed in this package to improve recycling from households?

Strongly agree

Supporting evidence:

The Salvation Army supports the Scottish government's proposal to strengthen community food redistribution networks, including additional funding. The Salvation Army has food banks in many of its centres in Scotland, some run in partnership with the Trussell Trust, and other food banks and food schemes run independently through the Church and charity's centres. Using our local networks in communities across Scotland, The Salvation Army is reaching people who can no longer feed themselves or their families and who are cut off from other sources of support.

The cost-of-living crisis is having a dramatic effect on The Salvation Army's food bank network. We are seeing a massive increase in demand for food parcels, and in reduced donations from the public, but we are nevertheless expanding our food bank network in response to this increase in need. The Salvation Army is pleased that food redistribution is seen as a key part of the government's strategy on food waste reduction.

6 Are there any further measures that you would like to see included in the Route Map to improve recycling from households and incentivise positive behaviours?

Further measures to include:

The Salvation Army supports the introduction of textiles EPR to strengthen the sorting and recycling infrastructure in the UK, increasing post-consumer recycled textile content in garments.

The Salvation Army called for separate textile collections in response to the Scottish government's previous consultation on the circular economy bill in 2019. We are pleased to see that there will be a consultation on requirements to separately collect textiles by 2025.

The Salvation Army urges the government to consider the need for separate collections to be convenient. A separate kerbside collection service implemented right across Scotland may not be the best outcome. Charity shops, in-store collections and recycling banks also have a role to play and these collections (which are thought to collect around 2/3rd clothing already, principally for reuse) are at no cost to producers or taxpayers, and there is a risk these collections could fail. We urge that policy making and clear communications for any new collections ensure that the rewearable fractions of clothing are captured in clean and dry collection channels, rather than being wasted by becoming incorporated in kerbside and HWRC collections at overall increased net cost.

It should also be noted that any waste charging needs to be joined up with recycling collections to ensure no unintended consequences, such as the charging leading to waste being disposed of in clothing recycling bins which are free. This has happened in the Netherlands, where the introduction of waste and recycling charges has led to wet/ dirty textiles having to be disposed of by the collector.

Charity shops deal with large number of donations, some of which cannot be resold. The Salvation Army encourages the Scottish government and local authorities to make it easier for charity shops to dispose of this household waste for free.

The Salvation Army would be pleased to work with the Scottish government to develop and trial cost-effective collections and recovery systems in Scotland, using our existing national network of textile collection banks and vehicles and a network of charity shops across Scotland

#### Package 4: Improve recycling from commercial businesses

7 To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses?

Strongly agree

Supporting evidence:

The Salvation Army supports these measures, and has no other comment to make regarding this question.

8 Are there any further measures that you would like to see included in the Route Map to improve waste recycling from commercial businesses?

Further measures to include:

The Salvation Army encourages the Scottish government to promote the arising of surplus stock on an on-line platform in real time. An example of this is the work carried out in Edinburgh by Topolytics and Defra on the Digital waste tracking project. Information and/or a register of waste/surplus and contacts could be made available to collection and service providers such as The Salvation Army's charity shop network (SATCoI) so that they can respond to specific opportunities. This could also have a spatial reference, so that collection and service providers can plan and invest in infrastructure/partnerships where there might be scale to respond.

#### Package 5: Embed circular construction practices

9 To what extent do you agree with the measures proposed in this package to embed circular construction practices?

Neither agree or disagree

Supporting evidence:

The Salvation Army has no comment to make regarding this question.

10 Are there any further measures that you would like to see included in the Route Map to embed circular construction practices?

Further measures to include:

The Salvation Army has no comment to make regarding this question.

### Package 6: Minimise the impact of disposal

11 To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste?

Neither agree or disagree

Supporting evidence:

The Salvation Army has no comment to make regarding this question.

12 Are there any further measures that you would like to see included in the Route Map to minimise the impact of disposal?

Further measures to include:

The Salvation Army has no comment to make regarding this question.

### Package 7: Cross-cutting measures

13 To what extent do you agree with the measures proposed in this package to support action across the circular economy?

Strongly agree

Supporting evidence:

The Salvation Army supports these measures, and has no other comment to make regarding this question.

14 Are there any further measures that you would like to see included in the Route Map to support action across the circular economy?

Further measures to include:

The Salvation Army supports the proposal for upskilling and training development around the circular economy. The Salvation Army operates an Employment Plus service with local employment centres located throughout the country providing support to any unemployed person who is looking for work.

The Salvation Army encourages the Scottish government to provide opportunities for people to participate within green skills, offering training and development opportunities for those who are struggling to find work. We would like to see circular skills and particularly repair skills to be a mandatory part of the curriculum for young people.

### Beyond 2025

15 To what extent do you agree with the principles proposed to underpin future circular economy targets?

Strongly agree

Supporting evidence:

The Salvation Army is encouraged by the Scottish government's aim to reduce our virgin material use by around 50% to achieve a sustainable international footprint. A key part of this will be closing the loop on textile manufacturing and ensuring increased levels of post-consumer recycled textiles (which comprise the majority of the waste stream) in new garments. The Salvation Army's charity shop network (SATCol) is working with partners to trial new fibre sorting technology to sort and treat post-consumer textile waste.

### Impact assessments

16 Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment.

Further information:

The Salvation Army has no comment to make regarding this question.

17 Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment.

Further information:

The Salvation Army has no comment to make regarding this question.

18 Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment.

Further information:

The Salvation Army has no comment to make regarding this question.

19 Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact Assessment.

Further information:

The Salvation Army has no comment to make regarding this question.

20 Please provide any further information or evidence that should be considered with regards to the environmental impact of proposals outlined in the Route Map.

Further information:

The Salvation Army has no comment to make regarding this question.

## About you

21 What is your name?

Name:

David Cavanagh

22 What is your email address?

Email:

scotland@salvationarmy.org.uk

23 Are you responding as an individual or an organisation?

Organisation

24 What is your organisation?

Organisation:

The Salvation Army - Scotland Office

25 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

26 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

27 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

28 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.: