

Scotland's draft Circular Economy and Waste Route Map to 2030 consultation – APSE Response

To: All Chief Executives, Main Contacts and APSE Contacts in Scotland. For information only to England, Northern Ireland and Wales

1 Executive summary

Scottish Government released a consultation on their proposals for the Circular Economy and Waste Route Map to 2030. Their proposals are designed to set the strategic direction and lay the foundations for their system-wide vision for the circular economy, the priority actions to accelerate more sustainable use of resources and how they plan to reduce emissions associated with resources and waste. The consultation asks questions about the extent you agree with the priority actions as well as further actions the Scottish Government are considering.

2 APSE Response

APSE was pleased to be given the opportunity to respond to the consultation. APSE's full response is outlined below:

About APSE

APSE's (Association for Public Service Excellence) aims and values are to support and promote the delivery of excellence in frontline local government services. APSE works with over 300 local authorities throughout the UK specialising in frontline service delivery issues. All local authorities within Scotland are members of APSE and in responding to this consultation APSE have considered the views of our member councils, including responses drawn from our discussions with our Scottish Waste and Recycling advisory group. We have also drawn upon data from APSE's Performance Networks service, which is the largest voluntary data benchmarking service in local government. As a representative body of our member local councils we have not endeavoured to answer every point raised in the consultation but to cover the main themes on behalf of our membership.

Our response

APSE, whilst in broad agreement with the principles of the proposals and further actions outlined

within the consultation would make the following comments and suggestions in response, informed by the APSE network of our member local authorities across Scotland. The Circular Economy and Waste Route Map to 2030, is Scottish Government's strategic plan to deliver Scotland's sustainable resource and circular economy ambitions to 2030. However, it is important to note that in order to achieve these proposals and actions, consideration needs to be taken in terms of timescales for local authority implementation, funding and resource requirements as well as subsequent policy and/or legislation changes which will impact local authorities waste management services such as DRS. These key areas will be required to be considered to ensure key priorities across local authorities can be successfully embedded to achieve the desired outcomes.

We would draw your attention to the following areas of interest: -

1. The importance of timescales when considering local authority implementation of service changes and the complexity of establishing schemes such as reduce and reuse.
2. The importance of adequate investment and resources being made available, in order to support change and drive improvements. This should also include communication, investing in public engagement and information campaigns as well as looking at behaviour change. The value of the role of public sector in helping with engagement and communication may assist in this regard if properly resourced and funded.
3. The importance of product stewardship as a key priority towards driving a more sustainable market of products and as such, shifts responsibility on to producers. However, given the wider potential UK implications and impacts, this should be part of a four-nation approach.
4. Consideration of the impact of any further policy/ legislative changes on local authority waste services and wider stakeholders, to ensure that positive effects are not countered.

Some of the areas that are under consideration for further actions to modernise recycling could be actively supported by APSE's Performance Networks Data. These existing datasets are a rich source to both monitor and report on performance information in terms of waste and recycling, supported by strong participation across Scottish Local Government as all councils in Scotland are members of this. Drilling down this data can also highlight areas of best practice that have and continue to support better waste management, improved recycling rates and ultimately the goals of a circular economy.

We have worked with a range of national governing and audit bodies on performance including Audit Scotland and SOLACE (Local Government Benchmarking Framework) and have actively supported national programmes through supplying robust and reliable performance data. We have also worked with SEPA on local government recycling measures. The current measures for performance networks are shown in **Appendix 1**, however the model does evolve over time and is flexible to introduce new measures if required.

In conclusion, it's important to note that local authorities are already undertaking a substantial amount of work in these areas. However, in order to ensure the successful delivery of Circular Economy and Waste Rout Map, adequate resources, finances and support will be required as well as consideration in terms of timescales for implementation.

APSE would be pleased to provide further detailed evidence of the matters raised herein to the Scottish Government or its advisors. In the first instance please contact Louise Melville on lmelville@apse.org.uk who is our lead advisor for APSE Scotland and she will be pleased to answer any questions on my behalf.

3 APSE Comment

As outlined within the consultation response above, it is important to note that in order to achieve these proposals and actions, consideration needs to be taken in terms of timescales for local authority implementation, funding and resource requirements as well as subsequent policy and/or legislation changes which will impact local authorities waste management services such as DRS. These key areas and others will be required to be considered to ensure key priorities across local authorities can be successfully embedded to achieve the desired outcomes

APSE Scotland Waste and Recycling members will continue to discuss this and all related issues within its advisory group meetings, as well as the upcoming [APSE Scotland Fleet, Waste and Grounds](#) event which takes place from 21 – 24 May in Aviemore. The event will include a presentation from Alex Quayle, Team Leader for Recycling, Scottish Government on the second consultation for the Circular Economy and Waste Route Map 2030.

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APSE Performance Networks Key Performance Indicators

- PI 02c Investment in refuse collection service per household (excluding landfill tax & waste disposal & CEC)
- PI 03b Tonnes of domestic waste sent/collected for recycling per household (Scotland only)
- PI 03g Tonnes of domestic waste sent/collected for recycling per 1,000 head of population (Scotland only)
- PI 03e Tonnes of domestic waste recycled per household
- PI 03f Kg of domestic waste recycled per head of population
- PI 03h Tonnes of domestic waste recycled per 1,000 head of population (Scotland only)
- PI 03i Net investment in recycling per household (excluding CECs)
- PI 11 Percentage of households covered by kerbside recycling collections
- PI 12a Percentage of total waste collected which is sent for recycling (Scotland only)
- PI 12b Percentage of household waste collected which is actually composted
- PI 12f Percentage of total waste collected which is actually recycled (Unitary only)
- PI 17b Customer satisfaction surveys
- PI 32a Kg of residual household waste landfilled per annum per head of population (Unitary authorities only)
- PI 32e Tonnage of residual household waste sent to landfill per annum per 1,000 head of population (Scotland only)
- PI 32d Kg of residual household waste landfilled per annum per household (Unitary authorities only)
- PI 32f Tonnage of residual household waste sent to landfill per annum per household (Scotland only)

Other financial performance indicators

- PI 02d Investment in refuse collection service per head of population (excluding landfill tax & waste disposal & CEC)
- PI 08c Total labour costs as a percentage of total expenditure (excluding waste disposal costs & CEC)
- PI 10c Transport cost as a percentage of total expenditure (excluding waste disposal costs & CEC)
- PI 18c Front line labour costs as a percentage of total expenditure (excluding waste disposal costs & CEC)
- PI 27 Investment per household excluding trade waste costs
- PI 37 Cost of domestic waste disposal per household
- PI 38 Cost of municipal waste disposal per household
- PI 41a Percentage change in total annual income generated
- PI 41b Percentage change in income generated from recycling
- PI 42a Agency / temporary / casual staff costs as percentage of total staff costs
- PI 42b Agency / temporary / casual staff costs as percentage total expenditure
- PI 45a Percentage change in net operational expenditure
- PI 46b Percentage change in cost of operational vehicles deployed

Customer Services performance indicators

- PI 15 Quality assurance and consultation process
- PI 16 Human resources and people management
- PI 33 Community / customer surveys undertaken

Efficiency performance indicators

- PI 04a Trade waste contracts (charged) as a percentage of available market
- PI 04b Number of trade waste agreements for recycling (free or charged)
- PI 04c Percentage change in trade waste contracts (charged / non recycling)
- PI 04d Percentage change in trade waste contracts (all)
- PI 20a Staff absence (all employees)
- PI 20b Staff absence - days lost per FTE (Scotland only) (all employees)
- PI 22a Missed collections per 100,000 collections (full year)
- PI 22b Missed collections per 100,000 collections (Apr – Sep)
- PI 22c Missed domestic residual waste collections (full year) per 100,000 collections
- PI 22d Missed domestic residual waste collections (April - September) per 100,000 collections
- PI 22e Missed separate recycling collections (full year) per 100,000 collections
- PI 22f Missed separate recycling collections (April - September) per 100,000 collections
- PI 35a Litres of fuel used annually in refuse collection vehicles per 1,000 head of population
- PI 35b Table - Average distance in miles to disposal site
- PI 46c Percentage change in number of operational vehicles deployed

Other recycling performance indicators

- PI 32b Percentage of residual household waste landfilled per annum (Unitary authorities only)
- PI 32g Percentage of residual household waste collected for/sent to landfill per annum (Scotland only)
- PI 32c Percentage of municipal waste collected for/sent to landfill per annum (Scotland only)

Sign up for APSE membership to enjoy a whole range of benefits

APSE member authorities have access to a range of membership resources to assist in delivering council services. This includes our regular advisory groups, specifically designed to bring together elected members, directors, managers and heads of service, together with trade union representatives to discuss service specific issues, innovation and new ways of delivering continuous improvement. The advisory groups are an excellent forum for sharing ideas and discussing topical service issues with colleagues from other councils throughout the UK.

Advisory groups are a free service included as part of your authority's membership of APSE and all end with an informal lunch to facilitate networking with peers in other councils. If you do not currently receive details about APSE advisory group meetings and would like to be added to our list of contacts for your service area please email enquiries@apse.org.uk.

Our national advisory groups include:-

- FM and Building cleaning
- Catering (School Meals)
- Cemeteries and Crematoria
- Cost of Providing/Cost of Living Network
- Highways and Street Lighting
- Housing, Construction and Building Maintenance
- Local Authority Commercialisation, Income and Trading Network
- Parks, Horticulture and Grounds Maintenance
- Recovery and Renewal
- Renewables and Climate Change
- Roads, highways and street lighting
- Sports and Leisure Management
- Vehicle Maintenance and Transport
- Waste Management, Refuse Collection and Street Cleansing

Visit www.apse.org.uk for more detail



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