

Changes to Waste Management Services (Scottish Government Consultation)

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

1. Executive Summary

The Scottish Government has launched a consultation on proposed changes to waste management services, focusing on two key areas: the Rural Food Waste Exemption and the Household Collection of Textiles. Additionally, the consultation explores the potential extension of the upcoming ban on landfilling biodegradable municipal waste, which will take effect in 2025.

Responses are due by Tuesday 17th June 2025. [Click here](#) for information and to submit your response; they welcome the answers to the provided questions and general feedback if it was not covered in the questions. [Click here](#) to read the full consultation report.

2. Overview

Scottish Government Consultation and Call for Evidence on Waste Management Policies

The Scottish Government is launching a consultation and Call for Evidence (CfE) to gather input on household recycling and waste management policies in Scotland. This consultation will help shape future policies alongside insights from the Circular Economy & Waste Route Map consultation and the co-design process for the new household recycling Code of Practice.

Ensuring high-quality recycling is a shared responsibility, and it is essential to make participation as easy as possible for households. They are encouraging feedback from local

authorities, industry stakeholders, and the public to help determine the most effective approach to achieving Scotland's waste reduction and recycling goals.

Landfill Ban and Its Potential Extension

Scotland is committed to ending the landfilling of biodegradable municipal waste (BMW) by 31 December 2025, a key step in reducing methane emissions—a greenhouse gas 28 times more potent than carbon dioxide.

While significant progress has been made, landfill methane still accounts for 78% of waste sector emissions (excluding energy-from-waste facilities), making further action necessary.

This consultation explores the potential extension of the landfill ban to non-municipal biodegradable waste, such as industrial and construction waste. Key considerations include:

- Which types of non-municipal biodegradable waste should be included in the extended ban?
- What infrastructure is needed to divert these waste streams from landfill?
- What financial and operational challenges could arise from extending the ban?
- Could fiscal measures, such as adjustments to the Scottish Landfill Tax, incentivise waste reduction?
- What are the risks of extending the ban, such as increased illegal waste disposal (flytipping)?
- How would reduced landfill waste impact landfill gas capture projects and associated revenue streams?

Review of Rural Food Waste Collection Exemption

Since 2012, local authorities have been exempt from mandatory food waste collection in designated rural areas where it is not economically viable. Given the importance of food waste recycling in reducing carbon emissions, they are reassessing whether this exemption remains appropriate.

This consultation seeks views on:

- The effectiveness of the current rural food waste exemption.
- Whether the exemption should be modified, removed, or replaced with alternative measures.
- The feasibility of expanding food waste collection infrastructure in rural areas.

Textile Waste Management

Despite making up only 4% of Scotland's household waste by weight, textiles contribute 32% of household waste carbon emissions. However, textile recycling is not widely practiced, leading to significant environmental impacts.

The consultation aims to explore:

- How to enhance textile recycling and reuse to prevent textiles from becoming waste.
- Whether kerbside collection of textiles would be beneficial.
- Additional measures that could improve textile recovery at Household Waste Recycling Centres (HWRCs).

Household Recycling and Waste Management

Achieving a high-quality recycling system requires collaboration between government, industry, and households. The consultation seeks input on:

- How to make household recycling as simple and accessible as possible to improve participation rates.
- How to ensure waste is sorted correctly to maximise recycling quality and minimise contamination.
- Potential policy measures to support more consistent recycling practices across Scotland.

Infrastructure and Policy Considerations

Ensuring Scotland has the right **waste management infrastructure** is crucial for supporting waste reduction initiatives. Key areas of focus include:

- The current capacity of waste treatment facilities and potential upgrades needed to accommodate increased landfill diversion.
- The role of financial incentives, such as Scottish Landfill Tax adjustments, in encouraging sustainable waste management.
- Possible unintended consequences, such as increased flytipping, and strategies to mitigate these risks.

Shaping Scotland's Waste Future

The insights gathered from this consultation will play a vital role in shaping Scotland's waste and recycling policies, ensuring they support a sustainable, circular economy, minimise environmental harm, and drive the transition toward a zero-waste society.

3. Consultation question

The consultation questions are categorised as follows:

- **Household Collection of Textiles (13 Q)**
- **Rural Food Waste Exemption (5 Q)**
- All Consultation Topics (7Q)
- **Call for Evidence on Extending Landfill Ban (24 Q)**
- About you (8 Q) Required
- Evaluation (1 Q)

Household Collection of Textiles

1. Do you consider your current options for textile recycling to be efficient?
2. Do you consider your current options for textile recycling to be accessible?
3. If you do not consider your current options for textile recycling to be efficient and/or accessible, what improvements would you recommend?
4. Do you believe household collection of textiles would provide benefits to householders?
5. What potential benefits do you consider household collection of textiles would provide to householders?
6. Do you believe household collection of textiles should be a service supplied by local authorities? Extra note: A mandatory service would be a statutory requirement for all local authorities in Scotland to collect textiles separately as part of their waste collection services at household kerbsides. This may require a separate household recycling bin.
7. If collections of textiles from households are not a service supplied by local authorities, do you think there should be a requirement for all local authorities to

offer textile recycling through Household Waste Recycling Centres or other bring facilities?

8. What is the estimated number of textile items you recycle/dispose of each year?
9. What services are currently available in your local authority area to recycle or dispose of textiles?
10. What services do you currently use in your local authority area to recycle or dispose of textiles?
11. Do you foresee any barriers or unintended consequences to local authority collection of textiles at the kerbside becoming a statutory service?
12. If your local authority offered household collection of textiles, how likely are you to utilise this service?
13. Do you have any additional views, regarding household collection of textiles or what you would expect a useful service to look like?

Rural Food Waste Exemption

1. Are you located in an area with a rural food waste exemption?
2. What is your preferred approach to the rural food waste exemption in the future?
3. If your local authority were to offer a kerbside food waste collection service, would you be likely to opt-in?
4. If you live or operate a business in an area in which the rural food waste exemption is used, what do you currently do with your food waste?
5. Do you have any other views regarding the rural food waste exemption?

Call for Evidence on Extending Landfill Ban

1. Which category in the following list best describes you?
 - Business that operates one or more landfill sites in Scotland
 - Business that operates one or more landfill sites outwith Scotland
 - Business that operates other non-landfill) residual waste treatment facilities in Scotland
 - Business that operates other (non-landfill) residual waste treatment facilities outwith Scotland

- Business involved in waste/materials management but not involved in the treatment of residual waste.
 - Business not involved in waste management
 - Professional body, trade organisation or governing body
 - Environmental group
 - Local government
 - Community group
 - Academic or research
 - Individual
 - Other (please provide details in the box below)
2. If you are replying on behalf of a business or representative organisation, please advise where your business is located, and an approximate size/number of staff (where applicable).
 3. Do you produce or handle/dispose of EWC (European Waste Catalogue) 19 12 12 wastes?
 4. If you produce waste from mixed non-municipal and municipal sources, can you provide data on the proportion of EWC 19 12 12 wastes coming from non-municipal sources?
 5. Do you have any data on the composition or characteristics (e.g., biodegradability) of EWC 191212 wastes sent to landfill at any point over the past 10 years?
 6. Are there alternative treatment options available to you for sorting residues (EWC191212 wastes) that could reduce the environmental impact of managing or disposing of these wastes? Are there any barriers to adopting alternative treatment options?
 7. Do you have any evidence about the need to continue landfilling sorting residues from the treatment of non-municipal waste?
 8. Do you agree with the list of non-municipal waste that are likely to be biodegradable and maybe biodegradable wastes, are there other wastes you consider biodegradable and do you have evidence on the biodegradability of any of these wastes that you can share?
 9. Are there biodegradable wastes, from Tables 6.2.1 (pg.11) and 6.2.2 (pg.12) or otherwise, that you think will need to be landfilled in the future?

10. Our Circular Economy and Waste Route Map noted an intention to identify priority waste streams to mitigate environmental impacts. Which waste streams would you consider to be the priority waste streams to divert from landfill?
11. Are there treatment options available for biodegradable wastes, from Tables 6.2.1 (pg.11) and 6.2.2 (pg.12) or otherwise? Do you have evidence or thoughts on why these materials continue to be landfilled?
12. What are the potential positive and negative impacts of not including soil in an extended landfill ban?
13. Do you have any views and/or evidence on the suitability of TOC (Total Organic Carbon), AT4, Dynamic Respiration or loss on ignition tests to determine the biodegradability of non-municipal wastes?
14. Do you currently carry out biodegradability testing of non-municipal wastes and if so, are you able to share any evidence or information on the testing that you carry out?
15. Would a ban on landfilling mattresses support increased recycling of end-of-life mattresses?
16. Would a ban on landfilling mattresses lead to the diversion of mattresses to incineration?
17. If mattresses could no longer be landfilled, what other barriers are there to increasing the recycling of mattresses?
18. What other policies should be considered to encourage the continued diversion of waste, particularly biodegradable waste, away from landfill?
19. Are there changes to the Scottish Landfill Tax, or other fiscal leavers such as the forthcoming Scottish Aggregates Tax, that could incentivise the diversion of wastes away from landfill, particularly biodegradable wastes that will not fall under the landfill ban?
20. What could the Scottish Government do to incentivise investment in alternative treatment infrastructure?
21. If further waste streams were to be included in the landfill ban, what timescale for implementing the ban would allow for industry preparations?
22. Are you able to share information about the potential costs associated with diverting waste to alternative treatment options for the wastes detailed here (including for example costs of testing)? (Please provide details and impacts if possible)

23. Do you have any evidence of other, unintended consequences of diverting waste, particularly biodegradable wastes, away from landfill (such as flytipping)? (Please provide details and impacts if possible)
24. Do you have any other comments or evidence that you would like to share on the potential expansion of the ban on landfilling biodegradable municipal waste?

4. APSE Comment

APSE encourages our members to respond to the consultation, as these proposals will have a significant impact on the work of local authorities and it is important that local authorities share their thoughts and views regarding these key areas, in helping to shape Scotland's waste and recycling policies.

Some of the areas that are under consideration for further actions to modernise recycling could be actively supported by APSE 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. 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. If your authority is not yet actively involved in APSE Performance Networks, please email the team on performance.networks@apse.org.uk and they will happily get in touch to discuss your data needs.

APSE has been actively involved in work with Zero Waste Scotland with the Litter Managers Network and through our involvement in many different working groups. This topic and others directly linked were a prominent feature of our [Scottish Fleet, Waste and Grounds](#) conference in May. Hollie Whitfield, Senior Policy Manager – Recycling at Scottish Government and Charlie Devine, Service Manager – Waste Partnership, Dundee City Council addressed the seminar on co-designing of sustainable household solutions. In addition, we had a number of expert speakers also presenting their thoughts regarding the future challenges for waste and recycling services, including consumer behaviours the upcoming emissions trading scheme. Several presentations also referenced the circular economy and

waste route map further. Presentations from the event are available to download free of charge using [this link](#) on the APSE website

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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 network groups include:-

- FM and Building cleaning
- Catering (School Meals)
- Cemeteries and Crematoria
- Highways and Street Lighting
- Housing, Construction and Building Maintenance
- Local Authority Commercialisation, Income and Trading Network
- Local Government Reorganisation 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

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