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Net Zero, Energy and Transport Committee  
c/o Clerk to the Committee Room T3.40  
The Scottish Parliament  
Edinburgh EH99 1SP

1<sup>st</sup> September 2023

To the members of the Scottish Parliament's Net Zero, Energy and Transport Committee,

## **THE CIRCULAR ECONOMY BILL AND CARBON-BASED CONSUMPTION TARGETS**

We, a group of organisations with environmental and social concerns, are writing to you to jointly request that carbon-based consumption reduction targets are included in the Circular Economy Bill currently being considered by the Scottish Parliament. In this letter, we set out why and how the Bill should be amended to include these targets.

The Scottish Government acknowledges that “sustainable consumption and production are essential for Scotland’s transition to a low-carbon and green economy, which will meet Scotland’s obligations to tackle the twin climate and nature emergencies.” However, the impacts of consumption are often invisible to people and it is only by reducing the global impact of Scotland’s consumption that our resource use can become sustainable.

Scotland’s existing climate targets do not include the impacts of our consumption which occur outside of the UK, such as the extraction and production of imported goods and the management of exported waste. This gap means that Scotland can meet its climate targets by moving economic activity outside our borders rather than reducing global demand. This makes Scotland’s mitigation efforts less effective than they could be. The Scottish Government’s own reporting indicates that this is happening: whilst domestic emissions have fallen, emissions due to imports are rising. In 2019, 58% of Scotland’s carbon footprint emissions came from imports.<sup>2</sup>

The Scottish Government has used a carbon-based consumption approach to report its carbon footprint for over a decade. Scotland’s carbon footprint measures the impact of our consumption of goods and services, from the food and clothing we buy, to the construction of buildings and infrastructure. Scotland’s carbon footprint is higher per person than the UK and EU average. To be sustainable, our carbon footprint must rapidly reduce but instead the carbon impacts of our imports are actually increasing. For 2018, the latest year for which data is available, Scotland’s consumption emissions grew 3%. Reporting these emissions is not enough: targets are needed.

Creating a circular economy, where we only take the resources we need from nature and use them as much as possible before disposing of them responsibly, is key to reducing Scotland’s overall consumption. When the Scottish Government consulted on the Circular

Economy Bill in 2022, 86% of respondents supported consumption reduction targets. However, the draft Bill includes circular economy targets only as an optional measure and lists four possible targets, none of which are carbon-based consumption reduction targets.

Introducing consumption reduction targets would also ensure Scotland keeps pace with the circular economy agenda internationally. In 2021, the European Parliament voted to create binding, science-based targets for material use and consumption footprint and in 2022, Sweden voted to introduce carbon consumption reduction targets.

### **Recommendation for the Bill**

Scotland should adopt a target to reduce its global carbon footprint to net zero by 2045, with an interim target by 2030, based on 1998 levels, with annual targets towards these goals.

The target should be set in the primary legislation of the Bill, to match Scotland's domestic climate targets. If they are not set in the primary legislation, there must be a mandatory requirement in the Bill for the Scottish Government to set carbon-based consumption targets in secondary legislation as soon as possible.

The journey to a circular economy must include targets but it does not end with them. Targets must be designed to link our national level ambitions with sector level plans for change. This will encourage the circular economy transformations needed, from greater support for reuse networks to a just transition for energy workers.

It is crucial that the Circular Economy Bill creates the right legislative framework to drive the transformation to a circular economy in Scotland. Carbon-based consumption targets are needed to guide the scale and pace of change. We urge the members of the Net Zero, Energy and Transport Committee to amend the Bill to include carbon-based consumption reduction targets.

We look forward to your reply. We would be happy to discuss this issue with the Committee or provide any other information you may require.

Yours,

Kim Pratt, Circular Economy Campaigner, Friends of the Earth Scotland

Liz Murray, Head of Scottish Campaigns, Global Justice Now

Ben Wilson, Head of Advocacy, Scottish Catholic International Aid Fund

Frances Guy, Chief Executive, Scotland's International Development Alliance

Andrew Tomlinson, Campaigns, Advocacy, Youth and Education Manager, Scotland, Christian Aid

Kathy Wormald, Chief Executive Officer, The Froglife Trust

Pine Eisfeld-Pierantonio, Marine Pollution Coordinator, Whale and Dolphin Conservation

Franciele Sobierai, Communities' Reduce Reuse & Recycle Project Coordinator, Edinburgh & Lothians Regional Equality Council (ELREC)

Kat Jones, Director, Action to Protect Rural Scotland

Beryl Leatherland, Scottish Wild Land Group

Craig Dalzell, Head of Policy and Research, Common Weal

Matt Lewis, Policy Manager, Circular Communities Scotland

Catherine Gunby, Executive Director, FIDRA

Simon Kenton-Lake, Senior Project Officer, Nourish Scotland

Matthew Crighton, Convener and Bruce Wilson, Vice convener; Scottish Environment LINK Sustainable Economy Group

Joaquin Blasco on behalf of Plastic-Free Scotland Communities (Plastic-Free Helensburgh, Plastic-Free Oban, Plastic-Free Dunbeg, Plastic-Free Eilean Siar, Plastic-Free Charlestown, Limekilns & Pattiesmuir, Plastic-Free Dalgety Bay)

Bobby Jewell, Coordinator, Architects Climate Action Network Scotland

Peter Hearn, Head of Planning, RSPB Scotland

Flick Monk, Community and Public Energy Campaigner, Platform

Calum Duncan, Head of Conservation Scotland, Marine Conservation Society

Catherine Gee, Deputy Chief Executive, Keep Scotland Beautiful

Janek Vahk, Zero Pollution Policy Manager, Zero Waste Europe

Gina Hanrahan, Head of Policy & Advocacy, WWF Scotland

Mike Robinson, Chair of Stop Climate Chaos Scotland