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

Dear Mr Mountain

The Environmental Protection (Single use Vapes) (Scotland) Regulations 2024

Zero Waste Scotland is grateful to the NZET Committee for the opportunity to provide views on The Environmental Protection (Single-use Vapes) (Scotland) Regulations 2024.

Zero Waste Scotland provided policy support to the Scottish Government during the development of the above-named regulations, producing a number of the impact assessments that accompanied both the consultation and final regulations. The responses below reflect an independent, organisational view of the questions being asked, but have been influenced by the work undertaken on behalf of government.

1. Do you agree that the supply and sale of single-use vapes in Scotland should be banned? If not, do you favour an alternative approach?

Zero Waste Scotland supports the decision to introduce legislation to restrict the sale and supply of single-use vapes in Scotland. The choice to ban the sale and supply of single-use vapes is currently the best available option to ensure the range of detrimental environmental impacts are addressed in a timely fashion. As this is expected to be enacted across the UK with a common coming into force date, it provides the best opportunity to tackle environmental concerns of the product and take forward the recommendation to ban single use vapes from the consultation on 'Creating a Smokefree Generation and Tackling Youth Vaping', which ran across Scotland, England, Wales and Northern Ireland last year. It will also fulfil the Scottish Government's Programme for Government commitment to reduce vaping among non-smokers and young people and take action to tackle their environmental impact.



With negative externalities in mind, single-use vapes are emblematic of the linear economy, where they are manufactured and sold purely on the basis of generating private profit at the expense of environmental and societal wellbeing; the traditional “make-use-dispose” approach.¹ Their linear design, manufacturing, and consumption present a barrier to achieving circularity in Scotland, and their continued consumption poses a risk of setback on achieving a more sustainable economy and society. Even when recycled, it is still not an efficient use of resources which could otherwise be put to better use, especially given their high cost of recycling which makes it uneconomical in many circumstances. Reusable vapes can typically last through 300 charge cycles² and, for the average user, can last between several months to over a year. This is in contrast to the limited longevity of single-use vapes, where most single-use vapes are estimated to contain around 600 ‘puffs’.³ Reuseable vapes are readily available and present an opportunity to maintain smoking cessation devices at lower environmental, social and economic cost.

Significant increase in numbers

The current, known challenges of disposable vapes are set to increase without policy intervention. Vapes have increased in popularity in recent years, becoming more mainstream products.⁴ In Scotland, it is estimated that the proportion of adults using vapes increased from 7% in 2019 to ~10% in 2022.⁵ This aligns with data collected for the Smoking Toolkit Study shows the proportion of adults making use of nicotine products increased from 7.3% in October 2020 to 9.5% in October 2023.⁶ Specifically, the proportion of adults using single-use vapes has increased, growing from 0.1 % to 4.9 % between January 2021 to August 2023 across the UK.⁷

Their use amongst young people has also increased significantly. In 2022, a survey by ASH⁸ showed that for the first time the most popular type of vape amongst young people in the UK was single-use e-cigarettes (vapes), with their use growing more than a 7-fold between 2020 and 2022 from 7.7% to 52%. Growth has continued since 2022, and in 2023 had risen to 69% of vape users under 18 said this was the vaping device they used most frequently.

Increase in littering and environmental impacts of single-use vapes

The rise in the use of single-use vapes has led to their increase in the waste stream. There has been growing concern over their environmental impact as they are typically littered or discarded as general waste, rather than disposed of correctly to be recycled. In 2023, it was estimated that almost 5 million single-use vapes were either littered or thrown away in general waste every week in the UK, almost four times as many as in the previous year.⁹

When single-use vapes are disposed of incorrectly, valuable materials including **critical materials** such as cobalt and lithium, are permanently lost. Such materials will be crucial in the

¹ <https://www.zerowastescotland.org.uk/resources/changing-our-throwaway-culture> Zero Waste Scotland, 2023

² <https://www.theelectroniccigarette.co.uk/batteries/the-ultimate-guide-to-e-cig-batteries> accessed online July 2024.

³ Department of Health, The Tobacco and Related Products Regulations 2016

⁴ <https://ash.org.uk/resources/view/use-of-e-cigarettes-among-adults-in-great-britain-2021> ASH England, 2023

⁵ The Scottish Health Survey 2022 – volume 1: main report. Scottish Government, 2023

⁶ <https://www.smokinginScotland.info/graphs/e-cigarettes-latest-trends> Smoking in Scotland portal. Updated 18 January 2024.

⁷ <https://www.sciencedirect.com/science/article/pii/S0033350623005036>

⁸ <https://ash.org.uk/resources/view/use-of-e-cigarettes-among-young-people-in-great-britain> ASH England, 2023,

⁹ <https://www.materialfocus.org.uk/press-releases/disposable-single-use-vapes-thrown-away-have-quadrupled-to-5-million-per-week/>

move towards Net Zero, particularly as societies move toward electric vehicles and increasing reliance on IT technology.

Keep Scotland Beautiful has cautioned that vapes are becoming the fastest growing litter stream.¹⁰ A 2023 report further estimated that between 21 - 26 million single-use vapes were consumed and thrown away in Scotland between April 2022 and April 2023.¹¹ When single-use vapes are littered, they can introduce a number of pollutants such as plastic, nicotine salts, heavy metals, lead, mercury, and flammable lithium-ion batteries into the natural environment.¹²

These chemicals have the potential to contaminate waterways and soil, and can be toxic and damaging to wildlife. Further, when littered, the plastic vapes casing can grind down into harmful microplastics. In addition, single-use vapes are primarily littered in public spaces generating clean-up costs to local authorities and the taxpayer.¹³

Following on from above, environmental impacts from the manufacture of single-use vapes are also a concern. A typical single-use vape contains plastic, copper, cobalt, and a lithium-ion battery. Lithium and cobalt are **critical raw materials** as noted in the UK's Critical Raw Materials Strategy¹⁴, which are essential to the production of electronic devices, batteries - including electric vehicles batteries, and energy generation.¹⁵ The increased demand for single-use vapes has led to an increased demand for these critical raw materials. This is a waste of valuable resources in a product with a be design short lifespan, that is poorly recycled, and has a reuseable alternative readily available. As well as a loss of resources, there are environmental impacts through raw material extraction, single-use vape production, and manufacturing, most notably, greenhouse gas emissions and water consumption.¹⁶

Waste management concerns

Single-use vapes which are disposed of as general waste or collected as litter will most likely either be landfilled or incinerated and pose a fire risk for waste collection vehicles and waste transfer sites due to their lithium-ion batteries. Compaction during the collection process increases the chances of puncture and combustion, setting fire to dry and flammable waste or household recycling around them. This endangers the public and collection crews, as well as damaging public and private property. It is estimated that lithium-ion batteries are responsible for approximately 48% (over 200) of all waste fires occurring in the UK each year.¹⁷

Single-use vapes are difficult and expensive to recycle.¹⁸ There is limited recycling process capacity available in the UK, our understanding is that capacity is generally via manual dismantling; which is both costly and time consuming as most single-use vapes are not

¹⁰ <https://www.keepsotlandbeautiful.org/news/2023/september/new-kid-on-the-block-single-use-vapes-become-fastest-growing-litter-item/>

¹¹ <https://www.zerowastescotland.org.uk/resources/environmental-impact-single-use-e-cigarettes>

¹² <https://www.gov.uk/government/calls-for-evidence/youth-vaping-call-for-evidence/youth-vaping-call-for-evidence> Office for Health Improvement & Disparities, 2023,

¹³ <https://cdn.zerowastescotland.org.uk/managed-downloads/mf-zazzy3b2-1688050338d>

¹⁴ <https://www.gov.uk/government/publications/uk-critical-mineral-strategy/resilience-for-the-future-the-uks-critical-minerals-strategy#what-is-a-critical-mineral>

¹⁵ <https://www.iea.org/reports/the-role-of-critical-minerals-in-clean-energy-transitions>

¹⁶ <https://cdn.zerowastescotland.org.uk/managed-downloads/mf-zazzy3b2-1688050338d> [Scoping policy options for Scotland focusing on understanding and managing the environmental impact of single-use e- cigarettes](#). Hogg, D., 2023.

¹⁷ <https://www.materialfocus.org.uk/press-releases/over-700-fires-in-bin-lorries-and-recycling-centres-are-caused-by-batteries-many-of-which-are-hidden-inside-electricals/> Material Focus, 2022,

¹⁸ <https://www.valpak.co.uk/dismantling-a-growing-problem/> Valpak, 2023

designed to be taken apart easily.¹⁹ Instead, they are manufactured as one unit and require specific tools to remove the lithium-ion battery for recycling and careful handling of components to avoid operator exposure to the remaining e-liquid.

Of the single-use vapes that are returned to a shop or recycling centre across the UK, it is estimated that only 1% are recycled due to the limited recycling capacity.²⁰ The remainder of vapes collected for recycling are likely to be sent to landfill given the Environment Agency's guidance (applicable across the UK) that whole single-use vapes should not be incinerated.²¹

Regulatory compliance

Recent research by Material Focus²² highlights that over 90% of vape producers and retailers in the UK are still not fulfilling their statutory obligations to provide and pay for takeback and recycling for vapes.²³ This lack of compliance with the existing Waste Electrical and Electronic Equipment Regulations 2013²⁴ (WEEE regs) compounds the impacts from incorrect disposal and continues to highlight the lack of accountability from vapes producers to manage their products end of life costs, from a product designed and sold as a purposefully single-use item. Current enforcement of the WEEE regs has been unable to have a major influence on improving producers' compliance. There are several factors compounding this issue. Enforcement agencies are not currently sufficiently resourced to follow up on the high numbers of non-compliant producers or to tackle illegal activities; under the WEEE Regulations vapes are included in the wide-ranging category 7 'Toys, leisure and sports equipment' whereby the costs of managing vapes that are captured by compliance schemes are in effect being paid for by other producers whose products also fall into category 7; and, correctly recycling vapes is disproportionately expensive to the cost of the item itself. This results in continued poor environmental outcomes, which the proposed ban on single-use vapes will affect in a positive manner.

Alternatives to single-use vapes – particularly as a smoking cessation tool

Single-use vapes have readily available alternatives in the form of reusable vapes. They offer the same alternative as single-use vapes to cigarettes for individuals who use them as smoking cessation tools.²⁵ These products have longer lifespans as they are made from more durable materials and are built to last longer. Although they are initially more expensive reusable vapes are, in cases where they are frequently used, considered to be more cost-effective in the medium to long term.²⁶

In the absence of evidence to suggest otherwise, it is deemed likely that some vapes producers and retailers who manufacture or sell single-use vapes will switch to reusable alternatives. As such, the availability of vapes for smoking cessation purposes are likely to remain broadly the same. Similarly, the availability of reusable vapes from online retailers will also remain as they are now.

¹⁹ <https://www.iema.net/articles/disposable-vapes-a-challenge-to-the-recycling-sector> IEMA, 2022,

²⁰ <https://sciencesearch.defra.gov.uk/ProjectDetails?ProjectId=21447>

²¹ <https://www.wastepackgroup.co.uk/2023/03/17/vapes-recycling-stance-set-out/>

²² Material Focus is an independent not-for-profit organisation. Their aim is to stop electricals being hoarded and thrown away, and ensure they are reused and recycled.

²³ <https://www.materialfocus.org.uk/press-releases/over-90-of-vape-producers-and-retailers-in-the-uk-are-still-failing-to-meet-environmental-regulations/> Material Focus, 2024

²⁴ The Waste Electrical and Electronic Equipment Regulations 2013. UK Government, 2013

²⁵ <https://www.gov.scot/publications/vaping-effectiveness-cessation-tool-evidence-briefing/>

²⁶ <https://assets.publishing.service.gov.uk/media/65eb1dac62ff489bab87b371/disposable-vapes-impact-assessment.pdf> DEFRA, 2024

As well as reusable vapes, individuals who currently use single-use vapes as a smoking cessation tool will continue to have access to tools and support such as nicotine patches and gum. Additionally, they will retain free access to support services such as Quit Your Way Scotland ²⁷ and NHS services through local pharmacies and GPs.

Impacts on businesses

We recognise that there will be an impact on businesses in Scotland who currently sell single-use vapes. As mentioned above, at this time it is believed that some retailers who currently sell single-use vapes are likely to switch to reusable vapes, or other vaping alternatives.

Engagement²⁸ with industry stakeholders highlighted concerns over the potential expansion of illicit sales of single-use vapes. Local authority officers (anticipated to be Trading Standards Officers) will be granted enforcement powers in order to enforce the Scottish regulations, which will mitigate against the risk associated with an illicit market for single-use vapes.

Single-use vapes are a fundamentally wasteful and unnecessary product, with readily available reusable alternatives that provide better environmental and social outcomes. In the move to a circular economy, linear products that promote wasteful practices, result in the loss of vital materials and have a significant social impact need to be phased out. The smoking cessation benefits of vape products are retained by reusable alternatives and businesses have sufficient advance warning to adapt business practices and offer less environmentally damaging products.

Other governments are responding to the challenges posed by single-use vapes in the same way. The French Government is considering a ban on single-use vapes, with the French Parliament voting unanimously to ban them late last year. Assuming the Senate and EU Commission also give their clearance, it is likely to be introduced later in 2024. Ireland, Germany and Belgium are all also considering or preparing to ban single-use vapes.

Other considerations

While supportive of the current approach, this policy, as with any other, should be part of a cohesive and comprehensive strategy to tackle single-use items, including complementary policy measures to avoid unintended consequences or displaced impacts elsewhere in the value chain, a wider strategy for communications, behavioural change aspects and enforcement.

2. Coming into force on 1 April 2025, the regulations ban the supply of single-use vapes in Scotland. What do you think about the timescale for implementing this ban?

Zero Waste Scotland supports the current timescale as a suitable time period to ensure sufficient engagement with all stakeholders, while still moving at pace to reduce the environmental impacts of single-use vapes.

Businesses and other interested stakeholders will have had over a year's notice to the regulations coming into force. This seems a sensible timeframe for businesses stakeholders to make changes to business practices, orders, running out stock and modifying services (waste collection for example) where necessary. We are aware that the vaping industry had also been discussing the potential of restrictions and alternative measures to ensure a responsible vaping industry in the UK. These discussions were taking place ahead of the restrictions being

²⁷ <https://www.nhsinform.scot/care-support-and-rights/nhs-services/helplines/quit-your-way-scotland/> website. NHS

²⁸ <https://www.gov.scot/publications/prohibition-sale-supply-single-use-vapes-full-business-regulatory-impact-assessment/pages/1/>

consulted upon and laid in parliament,²⁹ further highlighting the vaping industry's capability to align with the proposed timescale. Responses to the consultation would also appear to suggest the implementation timeframe is sufficient, and that businesses have already started planning for the change.

It also provides time for businesses and governments to ensure sufficient and appropriate communications and guidance is available to consumers, as well as impacted businesses and enforcement agencies. This for example, could include communications on reusable vape and vaping accessory alternatives to consumers, regulatory guidance for producers and retailers of vapes along with guidance for the various enforcement agencies to ensure clarity on their enforcement obligations and roles.

A common coming-into-force date across the UK nations would also clarify expectations for industry and consumers, allowing for joint communications to be undertaken. This will limit the chances of mixed messaging or confusing variations in policy between nations. As such, we hope the new UK government will deliver on the previous administrations' agreement to implement collectively.

3. A "single-use vape" - is any vape that is not refillable or rechargeable. Do you agree with this definition and are there any potential loopholes or unintended consequences?

The definition used in the regulations appears to be the most practicable wording at this time. However, it seems likely that it will fall to appropriate enforcement and product standards agencies to ensure producers and retailers follow definitions correctly.

In the spirit of creating a level-playing field and providing clarity we would advocate for clear guidance for producers and retailers with regards to fully explaining standards that their products must meet. Examples include vapes being practicably refillable and reuseable for everyone rather than simply 'technically'; that they are fully rechargeable for extended periods rather than minor component changes which burn out quickly; and that producers work with retailers to ensure free takeback of used vapes to be managed in line with the waste hierarchy ensuring valuable components are captured and recycled.

Without clear guidance for producers, unintended consequences could lead to short-lived reusable vapes simply replacing single-use vapes. While technically they would no longer meet the definition of a single-use vape, in reality they may only be useful for a small number of charges before becoming unusable. In essence, this would create identical problems currently posed by single-use vapes.

Adequate funding and support for regulatory authorities will be essential to ensure the policy fully meets the intended objectives.

4. The regulations establish two main offences with associated penalties. Do you think these penalties are proportionate?

Zero Waste Scotland is not a regulatory body and does not have enforcement expertise or powers.

²⁹ <https://ukvia.co.uk/wp-content/uploads/2024/02/UKVIA-Annual-Report-2022-2023-Screen-P1.pdf> UKVIA, 2023

However, our view is that in order to discourage individuals, groups or businesses from illegally selling and/or supplying single-use vapes we are **supportive of penalties being of a level that may truly offer a deterrent.**

The penalties provided for in the legislation appear to be broadly standard across other legislative examples and are in keeping with other powers using section 140 of the 1990 Environmental Protection Act. For example, 'on summary conviction to a fine not exceeding level 5 on the standard scale' can also be seen in The Environmental Protection (Single-use Plastic Products) (Scotland) Regulations 2021.

5. The enforcement powers granted to local authorities are extensive, allowing them to enter premises, take samples, and investigate suspected offences. What do you think of these powers both from the perspective of local authorities and businesses?

Zero Waste Scotland is not a regulatory body and does not have enforcement expertise or powers.

However, our understanding is that local authority Trading Standards Officers (TSOs) have various powers granted to them under legislation that they enforce. These include the ability to enter and inspect premises, examine goods and conduct test purchases. In some circumstances they may also enter a premises under warrant and seize goods and documents as evidence. The inclusion of test purchase powers is in keeping with Trading Standard powers under the Consumer Rights Act 2015 and Fireworks and Pyrotechnic Articles (Scotland) Act 2022.

Such powers act to:

- Protect consumers from illegal trading practices; and
- Support the legitimate business community to comply with consumer protection legislation.

This appears to be in line with the ranges of powers included in The Environmental Protection (Single-use Vapes) (Scotland) Regulations 2024. Our view is that it is essential **that local authorities are adequately resourced** to allow them to be able to undertake enforcement action when required. This will help to ensure regulations are upheld and there is a tangible prospect of penalties for those breaking the law.

For businesses, Trading Standards work to maintain a fair trading environment by supporting legitimate business and addressing non-compliance. This can effectively help legitimate businesses to ensure their long-term economic sustainability and help protect them from non-compliant traders. The enforcement powers granted through the regulations form part of their approach and will be essential to ensure rogue traders are identified. Legitimate businesses should have no cause for concern.

6. What do you think about the enforceability of the Regulations; potential key challenges in this area; and whether lessons can be drawn from any comparable areas, such as the single-use plastics ban.

We believe that the enforceability of the Regulations is largely dependent on UK-wide legislation coming into force at the same time. As the restrictions are on placing products on the market, it would be difficult for Scotland alone to enforce the regulations. It is also dependent on sufficient funding and wider resources being available to relevant regulatory bodies such as Trading Standards, Border Force and the Office for Product Safety and Standards.

Reflecting on learnings from the single-use plastics ban, it would perhaps have been useful to include an option for fixed penalty notices (FPNs). This would allow the relevant enforcement agency to issue fines at point of non-compliance if earlier enforcement activity was not heeded. This would also be beneficial in terms of providing an alternative to prosecution without referring the case to the Crown Office and Procurator Fiscal Service (COPFS), particularly where the relevant enforcement agency considers offences to be minor in nature. We are aware the Circular Economy Bill included powers for local authorities to issue FPNs in relation to the supply of environmentally harmful items, which may be applicable to single-use vapes offences in due course.

7. The policy objectives aim to reduce environmental harm and encourage reusable alternatives. Are these regulations sufficient to meet these objectives and are any supportive measures needed, for example, around communication, or uptake of reusable alternatives.

We consider when the regulations come into force, and accompanied by other legislative changes, such as WEEE EPR and packaging EPR reforms, the regulations will be sufficient in meeting the policy objectives. Further consideration will also need to be given of mitigating potential unintended consequences, for example ensuring reusable vapes are genuinely reusable, that sufficient take-back capacity is in place and that the correct infrastructure is established to manage refill accessory and packaging waste correctly.

This should form part of a wider cohesive strategy through appropriate guidance for producers and retailers, sufficient enforcement, and broader communications for consumers and other stakeholders. Consumer communications ahead of the ban coming into force will be key in ensuring they are aware of their options in terms of reusable vapes, where to purchase them and how to safely dispose of them.

Linked policy and international examples

Plans to reform the producer responsibility system for waste electrical and electronic equipment³⁰ have recently been consulted on. Proposals under review include the provision of collection infrastructure for household WEEE financed by producers of electrical and electronic equipment and creating a new separate categorisation for vapes to ensure producers of vapes properly finance waste management costs. The reported low awareness of producer obligations ought to be addressed by the implementation of these producer responsibility reforms.

Zero Waste Scotland was pleased to see the new UK Government will take forward the Tobacco and Vapes Bill³¹ as planned. A number of proposals³² put forward in the Bill will be complementary to the policy aims of the ban on the sale and supply of single-use vapes.

A number of other countries already have, or are planning to introduce, restrictions on single-use vapes. In the European Union, the Battery Regulation requires, from 2027, that portable batteries in most electronic devices (such as e-cigarettes/vapes), must be removable and

³⁰ <https://consult.defra.gov.uk/product-regulation-and-producer-responsibility/consultation-on-reforming-the-producer-responsibil/> Department for Environment, Food, & Rural Affairs, 2023,

³¹ Tobacco and Vapes Bill. UK Government. Current amended version, 16 May 2024

³² In particular Part 4 of the Bill in relation to (61) Retail packaging of vaping products and nicotine products and (62) Contents and flavour of vaping products and nicotine products.

replaceable by the users themselves.³³ Single-use vapes which do not currently meet these requirements will be prevented from being placed on the market in the EU as of 2027.³⁴

8. The Strategic Environmental Assessment says that the ban might result in an increased demand for illegally sold single-use vapes. What are the risks of increasing illegal sales of single-use vapes and how can those risks be mitigated?

It is very difficult to predict the risk of increases in sales of illegal single-use vapes. There remains a lack of clarity as to the current extent of this issue in Scotland (and the wider UK), however we are aware the illegal vape market already poses concern with issues such as banned ingredients, oversized tank sizes and exceeding legal nicotine strengths.³⁵ The same 2023 report for Defra suggests that the illegal vape market could be comparable in size to the legal vape market. Without appropriate plans for enforcement across the UK to prevent the import of single-use vapes, and to tackle those vapes from being supplied, it seems likely that there may be an increase in the sale and supply of the products. It also seems sensible to assume that in line with current illegal products, safety issues in terms of banned ingredients would continue.

A follow-on risk from the above is that the market for reusable vapes is undermined, with sales of illegal single-use vapes filling the gap left by the Regulations. This could pose a risk for legitimate retailers if they have to compete with rogue traders, who will not have the same regulator and compliance burdens to adhere to.

In terms of mitigations, the most critical would be to ensure UK alignment of the regulations coming into force. Concurrently, all four governments must ensure and provide sufficient resourcing for enforcement where illegal sales continue, and for an extended period i.e. not just the first few months.

Ready access to reusables must be encouraged and supported, along with suitable communications before and after the restrictions come into effect for consumers and businesses alike.

9. Various impact assessments have been completed by the Scottish Government. The Committee would welcome views on the financial, business, environmental, and equality impacts identified or other comments on the impact assessments.

Zero Waste Scotland led the production of a number of the impact assessments on behalf of Scottish Government and as such are unable to comment further.

10. The Regulations have been introduced following a UK consultation. Other UK countries are expected to introduce similar regulations. Do you have any views or concerns about alignment or cross-border implications?

In order to ensure there are no cross-border issues we believe it would be critical for all UK countries to have a common coming into force date. Our understanding is this is already the

³³ <https://www.consilium.europa.eu/en/press/press-releases/2023/07/10/council-adopts-new-regulation-on-batteries-and-waste-batteries/>

³⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32023R1542> Official Journal of the European Union, 2023

³⁵ <https://sciencesearch.defra.gov.uk/ProjectDetails?ProjectId=21447> Eunomia 2023

intention and will help to ensure there is no leakage on single-use vapes between countries, where one or more has a later coming into force date.

Having a single coming into force date would also provide producers and retailers with clarity on what is expected UK-wide and when it is expected by. This should simplify and minimise the number of changes required compared to multiple coming into force dates.

Our response to Q6 above regard enforcement is also relevant here.

Finally, we ask that you disclose in your response any direct or indirect links to the vaping or tobacco industry.

Zero Waste Scotland has no direct or indirect links to the vaping or tobacco industry.

Yours sincerely,

Iain Gulland
Chief Executive
Zero Waste Scotland