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Submitted to Delivering Scotland's circular economy: A Route Map to 2025 and beyond
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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?

Neither agree or disagree

Supporting evidence:

The AVA agrees with the principles and in general with the proposed actions. There is a risk that proposals could be simplistic and the AVA commends the EPECOM/Single Use Disposable Cups Charge Advisory Group approach enabling broad engagement of all parties/bodies involved as a way of identifying all the issues before proposing a final course of action.

The members of the AVA provide inexpensive drinks for the workplace. Almost all modern hot drinks vending machines have the option for the consumer to use their own cup. However, the decision on whether to use a single use or reusable cup is that of the consumer and the site. There is no doubt that single use cups solve a number of issues in the workplace: there are no arguments on who should load the dishwasher, no pile of unwashed cups and no problem of providing drinks to those who have forgotten their cup that day. Indeed, the original benefit of the drinks vending machine was the removal of the need for the tea trolley to bring cups of tea to staff at their workplace.

In order to move to greater use of reusables the industry would appreciate support from government for recycling schemes. Defra are proposing mandatory take back of single use cups across the UK. Support for this approach would be helpful from Scotland. It is important that any legislation is harmonised across the four nations of the UK to maximise its benefit and minimise inefficiency.

It is worth noting that many reusable cups are not made from particularly environmentally friendly materials. The EU has banned certain melamine formaldehyde resin based cups as they have been shown to release formaldehyde, a carcinogen, into the drink. Once they reach the end of their life such cups are not easy to recycle either physically or chemically.

The AVA has worked for over 10 years on developing routes for customers to recycle single use cups and there are now many proven options open. Our research has shown that this is not a situation where one size fits all and different solutions are appropriate for heavy industry, large warehouses and small, office based, companies.

The AVA would argue that single use paper cups are not environmentally damaging. They are made from sustainable wood, coated in a thin layer of polythene, which has a proven recycling process – there is sufficient UK based paper mill recycling for all paper cups used. If littered, the paper will break down. It is worth noting that there is no such thing as a plastic-free paper cup. The claims made for such cups are based on the definition of plastic in Regulation 2019/904 which includes the requirement that a plastic must be capable of functioning as a main structural component of a product. The products claimed to be plastic-free are effectively painted with a layer of plastic to make the cup watertight.

Cups make up only 4% of litter according to surveys (and the polythene is only 5% of the weight of the cup.) There may be greater benefit in directing attention to the items which make up 96% of litter.

Over 80% of drinks served in vending are in closed environments with immediate access to waste collection, including segregated waste, to enable the effective collection and subsequent recycling. Vended cups do not occur in litter.

What is needed is more action:

- to stop plastic cups with bamboo or bagasse fillers being sold as plastic free
- to encourage the development of working examples of successful reuse in companies of different sizes
- and to encourage recycling where single use is considered the best option on both environmental and economic grounds

The vending industry has an excellent record of both reusing and improving machines. Manufacturers have been reducing energy consumption of chilled food machines for over 15 years and most of the improvements have been retrofittable. The average life of a machine is of the order of 20 years as operators cannibalise parts from one machine to maintain another. Few working parts are scrapped in the vending industry. The industry has also introduced chillers that do not use HFCs as the refrigerant gas. However, these chillers cannot be used with older machines so that the reduction in availability of HFCs will cause a reduction in the working life of existing machines and increase annual capital expenditure as the working life of machines is decreased over the transition to HFC free.

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:

We would like takeback schemes for vended cups to be mandatory with no de minimis. There is a cost to recycling, which while small, is too much for vending operators to bear alone. Making take back mandatory would make schemes more efficient and cheaper overall as volumes would increase. This scheme should be allowed to prove itself before further changes are implemented.

The intention of the Modulated Fee system under EPR is to drive the circular, sustainable use of materials within the existing recycling infrastructure. This should be introduced, run and reviewed before other proposals are introduced.

We strongly support the EPECOM approach as it provides the opportunity to examine the implications of the changes before they are implemented. It is vital that the drive to remove single use does not encourage the development of new, difficult to recycle polymers or the marketing of multiple use materials with dubious environmental credentials.

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 members of the AVA supply long life, ambient stable, foodstuffs with an extremely low wastage rate. However, more customers are asking for sandwiches and prepared meals which have to be kept chilled. The management of stocks of these is more challenging since they have very limited shelf lives. Wastage rates tend to be around 15% as there is a fine balance between maintaining choice in the machine and minimising wastage. Total amounts of food waste are low and it will be helpful for there to be localised collection of food waste.

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::

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?

Agree

Supporting evidence:

The record of members of the AVA on reuse and recycling of components is very good. Little is sent for disposal unless it is completely beyond reuse or repair. All relevant equipment is sent as WEEE.

Because vending companies tend to be small or medium sized, they do not tend have enough waste to warrant an individual contract with a waste service provider so it would be very helpful to have a zoning scheme, particularly for food waste, but also for cardboard.

We believe that the Deposit Return Schemes will be most effective if common across the whole of the island of England, Scotland and Wales. Given that many SMEs including vending operator companies operate in at least 2 of the three administrations, different schemes in different countries will make life unnecessarily complicated.

We believe that making cup recycling mandatory will encourage separate collection of this high value material.

We also believe that the proposed review of what is actually recycled is very important and more emphasis should be placed on policing waste so that the streams of recycled materials are clean and of higher value. Making regulations which are not enforced will be of no benefit. The costs of enforcement should be built into the regulations.

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:

We would like the paper cup takeback scheme to be mandated without a de minimus threshold, which we consider would be confusing to the consumer who would be uncertain which outlets collected used cups.

Beyond 2025

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

Agree

Supporting evidence:

In order to reach carbon zero in the proposed timescale, companies of all sizes will need to be estimating their carbon footprint now, with targets on reduction over time. It would be helpful to have standard templates to allow SMEs to calculate their carbon footprint, to minimise the use of resources. The AVA has been working on this for a number of years. Our experience is that, members have been keen to reduce the emissions related to their business but have done this by attacking specific issues, such as the energy consumption of machines and few have a figure for their carbon footprint, even for just scopes 1 and 2.

About you

21 What is your name?

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22 What is your email address?

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23 Are you responding as an individual or an organisation?

Organisation

24 What is your organisation?

Organisation:

AVA: The Vending & Automated Retail Association

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

Publish response with 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?:

Slightly dissatisfied

Please enter comments here.:

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

Slightly satisfied

Please enter comments here.: