

Scotland's Zero Waste Plan

November 2009

Introduction

The Federation of Small Businesses is Scotland's largest direct-member business organisation, representing around 20,000 members. The FSB campaigns for an economic and social environment which allows small businesses to prosper.

For the last five years FSB Scotland has highlighted the need for the Scottish Government to examine how waste disposal options for small businesses can be expanded to allow Scotland and business to benefit from the opportunities offered by increased business recycling.

We recognise the role that business must play in achieving a more sustainable Scotland and we believe that small businesses have demonstrated their commitment to this in recent years; however small businesses require support to change, particularly in the current financial climate.

In responding to this consultation we have commented on a limited number of questions, however three key issues emerge from the consultation:

1. Local authority recycling facilities for small businesses;
2. Minimising bureaucratic demands on businesses while gathering waste data; and
3. Streamlining publicly-funded advice/delivery bodies engaged in the delivery of environmental advice to small businesses.

Small Businesses and the Environment – Recycling Facilities

We have always been happy to share data on environmental performance of small businesses with the Scottish Government. We previously carried out a membership survey on waste disposal in late 2004. At that time we learned that 43% of our members recycled some waste. The majority did not have hazardous waste streams, mainly disposing of paper, cardboard, and food waste (similar to household waste). Most businesses had their waste collected by their local authority.

Recent survey work with FSB members¹ suggests that Scottish businesses have made progress and have a commitment to environmental improvement. Data shows that 40% of our members have changed the operation of their business as a result of climate change.

¹ Data gathered in early 2008 for the biennial FSB membership survey. Data referred to is based on 708 Scottish responses.

In examining the most important catalyst for future improvements, the main factor cited was a general concern for the environment – fines and penalties were less important as motivation for change.

This recent data also shows that 84% of small businesses are now recycling some of their waste – a substantial improvement on the 2004 survey data. Responses also underline the ongoing importance of local authorities in small business waste disposal in Scotland, particularly when compared with other areas of the UK. The majority see local authorities as the main source of advice on environmental legislation and Scottish respondents are most likely in the UK to recognise that their local authority offered business kerbside recycling at a charge. 63% and 68% report that they use local authority facilities to recycle cardboard and paper respectively.

We remain concerned that some of the persistent problems relating to recycling are still a factor. Many businesses still feel that no facilities are available for recycling (21% felt no recycling was available for catering waste for example) and cost was cited as the main barrier in waste disposal. Overall only 43% were satisfied with the level of recycling offered by their local authority, perhaps suggesting a frustration at current limitations.

In 2007 SEPA completed a survey of trade waste facilities in Scotland's local authorities. This report highlighted the lack of consistency and patchy provision of services:

“4 LAs provide only a mixed residual waste collection service. Only 3 of these allow access to Recycling Centres (RCs) which indicates that there is no opportunity for traders to recycle through one LA. The remaining 28 LAs provide collections for various recyclates, although this is quite limited in some areas”²

We believe that evidence from our members shows that progress has been made in improving recycling amongst small businesses, as well as strong indications of support for environmental improvement. We now need to move forward to more concrete actions to improve the availability of affordable and practical recycling options for small businesses in Scotland.

Waste Data Collection

While we accept that it is clearly necessary to have information on waste streams in order to plan and build appropriate infrastructure, we would nonetheless like to see more explanation of which specific information is required and for which policy purposes. This justification would make it clearer where information requirements should be targeted and there would then be a clearer proposal for the regulations or working with particular sectors to develop a plan for gathering more comprehensive data (with the threat of legislation). We also believe that there must be scope to improve the sharing of data gathered through different licensing procedures and/or government agencies.

At present, we are not convinced that the small amounts of non-hazardous waste from most small businesses require blanket legislation potentially forcing them to complete paperwork which would be of little value.

² SEPA, Report of Survey Responses, Business Waste Framework Action 3.5, 2007

If mandatory returns regulations are introduced, they must be combined with a review of other environmental data gathered from businesses so that some kind of streamlining or reduction can be achieved. For example, we would be interested to see whether any work with existing Duty of Care paperwork would be possible?

At a time when the Scottish Government is committed to improving the regulatory framework for business we should avoid additional form-filling unless absolutely necessary. On this basis, attempts to improve waste data should be strictly targeted and specific exemptions for the smallest businesses should be considered.

Streamlining Environmental Advice

We have frequently highlighted to the Scottish Government the need to review the number of organisations delivering ‘environmental advice’³ to small businesses in Scotland. A number of larger organisations that operate across Scotland (and the UK) are keen to raise awareness of their services within the small business community. This is often in addition to regional/local projects and/or organisations.⁴

Many of these organisations are engaged in useful projects however we believe that this multitude of organisations and websites is confusing for small businesses and, ultimately, inefficient since there is likely to be significant overlap and duplication.

The Scottish Government should, as a matter of urgency, develop a more coherent, streamlined approach to ensure small businesses can more easily understand and access advice. A single portal approach should be considered.

Questions

QUESTION 3: WASTE DATA

See comments above.

QUESTION 4: AREA WASTE GROUPS

The existence of area waste groups and the specific development of business waste sub-groups was a helpful step in raising the difficulties of local business communities accessing suitable local facilities. The continuation of some local forum to raise these issues would be welcomed by the FSB – albeit this need not take the form of a set meeting. Better ongoing communication with trade waste customers would also help to raise priorities from a business perspective.

QUESTION 5: DELIVERY BODIES

See comments above.

QUESTIONS 7 & 9: TARGETS

We are keen to stress that the waste from many of our small businesses is included in municipal waste figures. In some areas, this business waste may account for up to a

³ For the purposes of this consultation we use the term ‘environmental advice’ to cover a broad range of resource efficiency advice covering: water, waste, energy and environmental regulation.

⁴ For example, some of the organisations and websites currently working with small businesses and the FSB include: WRAP, Envirowise, the Carbon Trust, NetRegs, Keep Scotland Beautiful/Business Waste Aware, the Business Environment Partnership, Energy Saving Trust Scotland

fifth of municipal waste. If further targets are placed on municipal waste reduction, it makes no sense to continue to ignore the potential for reduction from this group of customers.

The approach taken in the Business Waste Framework focusing on specific sectors of commercial and industrial waste seemed sensible and where there has been evidence of progress, targets may help achieve further improvements, but the government should be wary of setting targets for changes which are, ultimately, outwith its control. Our evidence suggests that most businesses are willing to improve their environmental performance and are making progress based on the current voluntary approach.

QUESTION 11: MUNICIPAL RECYCLING

We welcome the inclusion of references to the need to improve SME access to kerbside facilities and recycling centres – this is crucial in light of our comments above. Nonetheless we need to see more clearly defined actions to achieve this improvement. To date we have found the response to this agenda to be, at best, lukewarm from most local authorities⁵. The SEPA report outlines the potential difficulties from a local authority perspective. The budget constraints which will be placed on councils in the coming years is bound to make progress even more difficult than before.

QUESTION 12: DUTY OF CARE

As our evidence suggests, most businesses are well aware of their responsibilities and – since most are householders who have seen improvements to recycling at home – are keen to recycle more. Many are frustrated at the lack of practical and affordable options open to them.

Recent media coverage of small business premises being targeted and fined for the disposal of recyclate in public recycling facilities, e.g. paper from a small office, is completely unhelpful and counter-productive. For our smallest businesses (which often have no employees and perhaps only a small office premises) the different treatment of household waste and their office waste makes little sense.

Under these circumstances, and until we can improve the attitude and approach of those penalising small businesses who are trying to recycle, we would not advise a campaign highlighting Duty of Care.

QUESTION 21: FISCAL AUTONOMY

The FSB has previously suggested that the Scottish Government should consider incentives to encourage small businesses to improve their environmental performance (particularly recycling). Existing schemes, such as the Climate Change Levy, have tended to be developed with larger businesses in mind and are not helpful for small businesses.

In this respect, the Scottish Government might be able to develop a more flexible approach to incentivise the performance of small businesses. On the other hand, small businesses would undoubtedly be concerned that the Scottish Government might be tempted to increase the rate of landfill tax in Scotland which, although

⁵ Some individual authorities have engaged in improving their facilities e.g. Perth & Kinross and Fife Councils.

tempting from an environmental perspective, would be extremely unhelpful to the government's priority of economic growth and might place Scotland at a competitive disadvantage within the UK.

For further information on any of the points raised in this submission, please contact Susan Love, Policy Manager, on susan.love@fsb.org or **0141 221 0775**.