

# Transport and Environment Committee

10.00am, Thursday, 27 January 2022

## National Litter and Flytipping Strategy Consultation

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### 1. Recommendations

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- 1.1 Transport and Environment Committee is asked to approve the draft response to the Scottish Government's consultation on a new Litter and Flytipping Strategy for Scotland.

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## National Litter and Flytipping Strategy Consultation

### 2. Executive Summary

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- 2.1 The report seeks approval of the Council's draft response to the Scottish Government's consultation on a new National Litter and Flytipping Strategy.

### 3. Background

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- 3.1 This consultation proposes potential actions to tackle litter and fly-tipping in Scotland. Responses to this consultation will inform the development of the final National Litter and Flytipping Strategy for Scotland, which is expected to be published in 2022.

### 4. Main report

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- 4.1 Litter and fly-tipping is a blight on communities and the environment which reduces quality of life and enjoyment of local spaces and has wider direct and indirect environmental consequences, such as the escape of plastics into water courses.
- 4.2 This consultation by the Scottish Government, which was drafted in partnership with Zero Waste Scotland, Keep Scotland Beautiful and the Scottish Environment Protection Agency (SEPA), is seeking views on the aims, objectives and actions that will sit under the new National Litter and Flytipping Strategy for Scotland. The responses to this consultation will help shape and deliver the final strategy which will be published in 2022. The consultation will run until 31 March 2022.
- 4.3 The focus is on preventing litter and flytipping from occurring and effectively dealing with it when it does, with potential actions identified under key themes such as:
- 4.3.1 Behaviour change;
  - 4.3.2 Services and Infrastructure; and
  - 4.3.3 Enforcement.
- 4.4 The current strategy explicitly recognises that this is not something which local government can deliver in isolation. Achieving this will require cohesive and sustained efforts across society, including local authorities, national parks, Police Scotland, SEPA, the third sector, businesses and the public themselves. Engagement and consultation with a wide range of stakeholders is a crucial aspect of the new strategy development.

- 4.5 Scotland's first National Litter Strategy "Towards a Litter-Free Scotland: A Strategic Approach to Higher Quality Local Environments" was published in 2014. A review of this strategy and the activity that took place as a result, was completed in 2019. It is recognised that while a number of the initial actions have been delivered or are under development, overall there has not been an improvement in Scotland's environmental quality.
- 4.6 Furthermore, the last two years have seen a deterioration in Scotland's local environmental quality as behaviours have changed and litter and flytipping have increased during the pandemic, while collection services have been stretched as a result of staff illness, operating restrictions and the need to prioritise critical services.
- 4.7 The consultation focuses on the broad themes of data, enforcement and infrastructure and seeks views on these. It asks specifically about flytipping as distinct from litter with the likelihood that the new strategy will give greater weight to the latter as a distinct issue than the earlier strategy did.
- 4.8 While the consultation's focus is on the activities of littering and fly-tipping on the local environment and quality of life, the draft response highlights that there is an opportunity for the Scottish Government to go further in tackling the wider environmental, carbon and sustainability impacts associated with consumption of avoidable items (which are also commonly littered).
- 4.9 These benefits could be achieved by designing out some of the problem items through extending the use of bans from sale, or the use of extended producer responsibility legislation to ensure correct recycling of commonly fly-tipped items
- 4.10 Appendix 1 outlines the Council's draft response for Committee's consideration.

## **5. Next Steps**

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- 5.1 Subject to approval by Committee, the Council's submission to this consultation will be completed by the deadline of 31 March 2022.

## **6. Financial impact**

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- 6.1 There are no direct financial impacts foreseen as a result of this report. Longer term, efforts to reduce littering and flytipping would be expected to have a positive financial impact through reduction in the cost of cleaning up litter and flytipping.

## **7. Stakeholder/Community Impact**

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- 7.1 This report sets out the Council's draft response to the Scottish Government's consultation. The Council is itself a consultee.
- 7.2 There are no equalities, health and safety, governance, compliance or regulatory implications foreseen from this report that need to consider when reaching their decision.

- 7.3 The issues of littering and flytipping have negative impacts on the local environment and quality of life but can also have wider negative impacts. The focus of the consultation is on supporting public bodies and citizens to reduce these issues. The Council's draft response highlights that there is an opportunity for the Scottish Government to go further in designing out some of the problem materials through extending the use of bans from sale, or the use of extended producer responsibility legislation to ensure correct recycling of commonly fly-tipped items. These measures would have benefits in terms of consumption, carbon and the wider environment.

## **8. Background reading/external references**

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- 8.1 The Scottish Government's consultation is published by the [Scottish Government](#).

## **9. Appendices**

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- 9.1 Appendix 1: Draft response to the consultation

# Appendix 1

## National Litter and Fly-tipping Strategy Consultation Questions and Responses

### Litter

1. (a) Do you support the proposed action to conduct research to understand the full range of influences on littering behaviours (action 1.1)? **Yes / ~~No / Do not know~~**

(b) Please give reason(s) for your answer.

In order to know how to respond to littering it is important to understand why it's happening.

The City of Edinburgh Council expects that Keep Scotland Beautiful will have historical data from the work they have carried out in this area for many years. This would help to provide a clear understanding of what further research should focus on and who the key stakeholders should be.

Data captured through LEAMS (and LMS going forward) on the types of litter being encountered should be analysed to get a local and national picture of the problem.

It would be interesting to see to what extent the reasons given are actually genuine (for example, feedback that "there should be more bins" when it is not reasonable to expect there to be a litter bin at every location someone might want to dispose of a crisp packet).

2. (a) Do you support the proposed action to develop and adopt a national anti-littering campaign (action 2.1)? **Yes / ~~No / Do not know~~**

(b) Please give reason(s) for your answer

A culture of littering has been allowed to develop over many years, so addressing this is going to require long term culture change.

A national campaign would certainly be helpful to start that process and would support local action, which would be linked to local priorities and issues and appeal to people's sense of place.

A campaign which recognises that sometimes people do not perceive what they do is littering e.g. some people would never deliberately drop a crisp packet on the ground but do not think twice about throwing away a cigarette butt.

A national campaign would serve to support the work being delivered locally in this field and could bring all the strands together to show people how their behaviour contributes (positively and negatively).

**3. Which topics should be a priority to address by behaviour change interventions?**

The LEAMS/ LMS surveys can be used to highlight priorities at a local and national area level, and these are likely to vary by area. However, it should be noted that these may not always align with public perception. For example, cigarette ends are a particular issue in Edinburgh, but this may not be seen as an issue for members of the public who are less likely to notice these compared to small items of furniture left in the street or food wrappers.

**4. Is there a need to develop a standard definition for litter that can be used across Scotland? **Yes /~~No~~ /~~Do not know~~****

As this would help address the issue highlighted in response to question 3.

**5. Do you support the following proposed actions to:**

- **Action 3.1: Review available litter data and reach an agreement between stakeholders on a common approach to data collection?**

**Yes /~~No~~ /~~Do not know~~**

- **Action 3.2: Identify commonly littered items and litter hotspots and work with local authorities to develop targeted interventions?**

**Yes /~~No~~ /~~Do not know~~**

- **Action 3.3: Increase the use of citizen science to support data levels and composition of litter?**

**Yes /~~No~~ /~~Do not know~~**

**(b) Please give reason(s) for your answer.**

Understanding what is causing the most problems in local areas is key to targeting interventions efficiently.

**6. What would encourage increased participation in citizen science data collection?**

It should be noted that while initiatives such as National Beach Clean hold detailed information and trend analysis over many years, this level of intervention might be a lot to ask of some community clean ups which do not necessarily have the resources or desire to develop datasets like this.

The City of Edinburgh Council has already done some work in this area, and Changeworks were commissioned to produce a feasibility study on behalf of the Council focused on the viability of community-focused initiatives and resources to

empower Edinburgh communities to recycle more, reduce waste and widen community involvement in activities such as community clean ups, graffiti removal and weeding.

Residents and community group representatives from across the city were surveyed to determine current priorities, expectations and barriers, and Council officers were consulted to identify existing support processes and perceptions around how community needs are currently supported.

The resulting data was analysed for trends and themes and recommendations for initiatives aimed at improving community empowerment were proposed. We would be happy to share this information with the Scottish Government.

**7. (a) Do you support the proposed actions to:**

- **Action 4.1: Review of CoPLaR (2018) and its implementation by duty holders?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 4.2: Explore the use of flexible and innovative interventions to support litter prevention and removal?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 4.3: Establish an action focused group to encourage collaboration and share best practice between local authorities, national parks and other duty bodies?**

**Yes / ~~No~~ / ~~Do not know~~**

**(b) Please give reason(s) for your answers**

The different duty bodies are likely to have some common issues but quite different knowledge and understanding of how best to tackle these.

**8. Please provide examples of flexible or innovative interventions that have or have not worked well.**

**Branding**

The OurEdinburgh brand is used to promote waste and recycling services, including litter, flytipping and related issues such as dog fouling. It is a flexible brand which can be used to promote pride in the city or in the individual neighbourhood and can be

tailored to focus on citywide issues or on specific issues within a local community. Using the same branding serves to link the messages together in the public mind.

It can also be used to support specific events. For example, we use it during the summer festivals and use jokes (linked to the events themselves) to highlight litter and make the bins stand out visually in busy, crowded areas.

### **NEAT Streets**

Between May and July 2016, 21 audits were undertaken in the Grassmarket area of central Edinburgh to evaluate the litter intervention campaign NEAT streets, which was being delivered in a partnership between the local authority, the Business Improvement District, HUBBUB and Keep Scotland Beautiful.

As expected, the majority of litter was cigarette ends accounting for two out of every three litter items counted. Interventions were developed to tackle this, using high profile eye level bins, linked to “nudge theory” - the bins had two compartments and these were see through. Questions were printed on the bins and people asked to “vote” for the answer (e.g. their favourite person in Trainspotting) using cigarette ends, rather than dropping them on the ground.

### **Recycling**

In summer and autumn 2019 we worked with HUBBUB and Changeworks to develop a network of litter bins in the city centre for cans, plastic bottles and coffee cups and these were complemented with takeback schemes for coffee cups in participating stores in the area. As with previous similar initiatives to recycle litter, the materials were heavily contaminated and it was concluded that it was not environmentally justifiable to run separate (diesel) vehicles to collect just a few grams of heavily contaminated recycle at each location.

### **Zero Waste Towns**

The Council has worked with two projects funded through Zero Waste Scotland’s Zero Waste Towns initiative.

Zero Waste Leith was led by Changeworks and sought to encourage behavioural change across a range of metrics including litter, flytipping and recycling by fostering a sense of place in a diverse, high density and often very mobile community. A focus on flytipping sought to raise awareness of how to dispose of items correctly, whether for reuse or disposal.

Zero Waste Edinburgh was led by Shrub Co-op and has worked with the Council to tackle end of term waste in south central Edinburgh when there is a large population movement and a lot of waste to be disposed of (either by departing students or landlords). This causes the communal bins to overflow. Shrub have been operating mobile collection points at that time of year to encourage people to donate reusable items. These are stored over the summer and then distributed to incoming students and the wider community in the autumn, e.g. through “free shops” and via the

organisation's own Zero Waste Hub. In addition, the project raises awareness of disposal routes for larger items, so these are not flytipped.

**9. How can increased collaboration and information sharing across local authorities, national parks and other duty bodies be achieved?**

There is a litter and flytipping forum in existence already for this purpose, which could be expanded or refocussed.

**10.(a) Do you support the proposed actions to:**

- **Action 5.1: Create a national litter hub to provide information to community groups?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 5.2: Create a community-focused litter education programme?**

**Yes / ~~No~~ / ~~Do not know~~**

**(b) Please give reason(s) for your answer.**

A hub that people could go to could be a valuable and simple tool for community groups who would like to do something but are not sure how.

**11. What advice, information and support should be included in a national litter hub?**

It could provide examples of successful (and unsuccessful) projects and lessons learned, or checklists (e.g. how to carry out a litter pick), and links or contact information for existing initiatives.

**12. What topics should be included in a community-focused litter education programme?**

This would need to vary by area as not all areas have the same issues. For example, are there lots of pubs, with smoking related litter outside? Or is it a school route, with discarded packaging?

The data from LEAMS and LMS should be able to provide information about key issues.

**13.(a) Do you support proposed actions on enforcement of litter offences to:**

- **Action 6.1: Conduct an evidence review of barriers to enforcement?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 6.2: Explore raising current fixed penalty notice amounts?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 6.3: Explore potential alternative penalties to monetary fixed penalties?**

~~Yes / No /~~ **Do not know**

**(b) Please give reason(s) for your answers.**

- 6.1 This would help to understand what the barriers are to enforcement and perhaps deliver a consistent approach nationwide.
- 6.2 The City of Edinburgh Council does support the review but would caution that a proportionate approach needs to be taken to ensure the penalty is appropriate for the offence. Simply increasing the penalty might not help if the person cannot pay. In this event the Scottish Government could consider a “payment plan” approach - a Fixed Penalty has to be paid in full within a defined timescale - it might be appropriate to consider allowing this to be paid in instalments.
- 6.3 The City of Edinburgh Council would require further information on what the alternative penalties were and how these might be delivered to provide a full response to this question.

**14.(a) Do you support the proposed action to review and further develop guidance on enforcement best practices (action 7.1)?**

~~Yes / No / Do not know~~

**(b) Please give reason(s) for your answer.**

Guidance would provide consistency across all enforcement agencies and partners, and potentially improve cross border investigations. It might also allow for partners like SEPA and Police Scotland to provide a more consistent and collaborative partnership working across all areas.

**(c) What should be included in this guidance?**

Basic templates for enforcement activities and weblinks to clear and consistent guidance with clear definitions of offences.

# Flytipping

**15.(a) Do you support the proposed action to conduct research to understand behaviour that leads to flytipping (action 8.1)?**

**Yes / ~~No~~ / ~~Do not know~~**

**(b) Please give reason(s) for your answer.**

In Edinburgh, the experience of flytipping might be quite different to a more rural authority. A lot of the flytipping Edinburgh experiences, particularly in high density housing areas, is more often a single item type put out for collection, rather than accumulations of builder's waste, etc (although this does happen too).

Issues which lie behind this are, or could be:

- People do not care / consider it somebody else's problem;
- People do not know how to get rid of it properly (and have not looked it up); or
- If I leave it out, someone might want it.

Research carried out locally in Edinburgh suggested lack of knowledge was a key factor. The Council has tried to address this through marketing of our Special Uplift service and the Reuse Hotline.

Trying to tackle the first point is likely to be difficult though, as it is difficult to identify who put the items out.

In 2015 the City of Edinburgh Council ran a project, in conjunction with Zero Waste Scotland, which looked at flytipping in tenement housing areas of the city and what effect different interventions (education, infrastructure and enforcement) might have. In the course of the project, there were a number of findings and observations made about how future interventions might best be carried out, for maximum impact.

A guide was developed which aimed to bring together a summary of the project, with an overview of the findings, to help other local authorities implement future interventions as successfully as possible.

A key finding was that while the project was successful in raising awareness of the issues, it did not lead to behaviour change, underlining the challenges around this problem.

**16.(a) Do you agree with the proposed actions to:**

- **Action 9.1: Develop a sustained, evidence based, national anti-flytipping behaviour change campaign?**

**Yes / ~~No~~ / ~~Maybe~~**

- **Action 9.2: Create a single information point containing advice on disposal of commonly flytipped materials?**

**Yes / ~~No~~ / ~~Maybe~~**

**(b) Please give reason(s) for your answer. Are there topics that should be a priority to address in this campaign?**

People do need to be aware that their waste is their responsibility and that leaving it in the street is not acceptable. Neither, for most people in 2022, is not looking up a website and just hoping for the best.

Equally, particularly where residents are transient, it is very difficult to communicate with them, and some people also do genuinely hope some of their waste might be useful to someone so an expansion of the reuse helpline would be desirable to tackle that.

People also need to be made aware that if someone is offering to take your waste away very cheaply, they are quite likely to be dumping it. In Edinburgh, a special uplift only costs £5 per item (and household waste recycling centres are free) – which is actually likely to be cheaper in most cases than disposing of it illegally.

**17. Are there topics that should be a priority to address in behaviour change interventions?**

- If someone is collecting your waste (other than the local authority) are they registered with SEPA? Do you know where your waste is going?
- For smaller, or single items, book an uplift, don't just leave it out and hope someone will take it.
- Raise awareness of genuine reuse organisations and expand the reuse helpline.

**18. What information should be included in the single information point?**

Information about how to report fly-tipping, i.e. whether to contact the local authority or SEPA.

19. Is there a need to develop a definition of flytipping that can be adopted across Scotland?

**Yes / ~~No~~ / ~~Do not know~~**

People do need to understand that presenting items such as furniture at the kerbside without booking an uplift is fly-tipping, and is not the way to deal with it.

20.(a) Do you support the proposed actions to:

- **Action 10.1: Create a data sharing agreement to support gathering of data and work with stakeholders to improve consistence of data collection?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 10.2: Explore incorporating data into a national database?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 10.3: Review the Dumb Dumpers system and ensure a fit for purpose mechanism for citizen reporting of flytipping exists in Scotland?**

**Yes / ~~No~~ / ~~Do not know~~**

- **Action 10.4: Explore the development of a live picture of flytipping across Scotland?**

**Yes / ~~No~~ / ~~Do not know~~**

(b) Please give reason(s) for your answers.

At the current time most flytipping is probably reported to the local authority and most people are probably not aware of SEPA's role or the difference between public and private land. As a general rule, the public think the local authority is responsible for all issues relating to waste, but this is not always the case.

It would therefore be helpful both to raise awareness of SEPA and the work they do, and also to ensure people are signposted to the right place and also to ensure data is shared appropriately.

In general, the local authority focus, if the dumping is reported to the Cleansing service, will be on clearing the incident as quickly as possible if they are responsible for the site. Such reports may not always be investigated and indeed the nature of fly-tipping may make it very difficult to do so.

SEPA are better able to carry out investigations for larger accumulations,

21.(a) Do you support mandatory reporting of flytipping incidents for statutory bodies?

~~Yes / No /~~ **Do not know**

(b) Please give reason(s) for your answer.

We require further information on how the data would be handled.

22.(a) Do you think we should continue to use Dumb Dumpers as the national reporting tool?

Do not know

(b) Please give reason(s) for your answers.

Dumb Dumpers (or a similar brand if it is rebranded) is a useful way of highlighting that flytipping is an offence and raising awareness of it generally. It could also be expanded to make it clear to people that they also have responsibilities for disposing of their waste properly, i.e. if you hire a very cheap skip hire or disposal service, you might be a dumb dumper and that could have consequences.

However, the need for Dumb Dumpers to then report the issue to the local authority can cause a delay. Information might be incomplete, or it might go to the wrong team. Sometimes it might even go to the wrong authority (e.g. if it is near a local authority boundary).

(c) What are barriers to reporting flytipping incidents that occur on private land?

Not knowing who the land belongs to.

(d) Who would you report flytipping to?

Local authority (generally for individual items at the kerbside)

23.(a) Do you agree with the proposed actions to:

- Action 11.1: Support and encourage information and resource sharing between stakeholders?

~~Yes / No / Do not know~~

- Action 11.2: Explore how to support and encourage more reuse and repair of products that are commonly flytipped?

~~Yes / No / Do not know~~

- Action 11.3: Explore a flexible approach to waste disposal with a view to trial interventions?

~~Yes / No / Do not know~~

**(b) Please give reason(s) for your answers.**

Many of the items which are fly tipped are items which could have been reused. That appears to be one of the reasons people leave them in the street, in the hope that someone will take them away. There is an opportunity to highlight the ways in which these items can be disposed of more responsibly, and to make sure people do think of these. There is scope to expand the national reuse helpline's reach both in terms of use by the public, and the information it provides about alternative outlets for items.

**24. How can we support and encourage sharing of data and joined up services and Infrastructure?**

No response

**25. Please provide examples of interventions (for example, amnesties or recycling groups) that have or have not work well?**

The City of Edinburgh Council has carried out targeted amnesties for bulky waste over a number of years. These do generate large volumes of waste, because people use them as a means to get rid of items they already have but there is no evidence that they actually tackle flytipping. In addition, due to the nature of the items and way it is presented it can be difficult to sort them for recycling and this then depresses the recycling performance.

As a local authority we do not have the resources to accommodate the free disposal of materials from private land, for which we are not responsible.

**26. What are the barriers to disposing of asbestos?**

As a local authority we do not have facilities/resources/skills to manage asbestos, and if any is fly tipped on public land, we need to bring in a specialist contractor to manage it.

**27.(a) Do you agree with the proposed actions to:**

- **Action 12.1: Explore the role of technology in assisting private landowners and land managers deter flytipping on their land?**

**Yes / ~~No / Do not know~~**

- **Action 12.2: Produce updated guidance for private landowners on dealing with flytipping?**

**Yes / ~~No / Do not know~~**

- **Action 12.3: Explore alternative financial support mechanisms available to private landowners and land managers?**

~~Yes / No / Do not know.~~

(b) Please give reason(s) for your answer.

This set of questions would be best answered by those affected, but we must recognise that the private landowners are themselves victims of a crime and are not the cause of the problem.

28. What support mechanisms need to be in place to help private landowners that are victims of flytipping?

Some landowners might not be aware that they can seek advice from the local authority. The City of Edinburgh Council would certainly help landowners e.g. by providing advice about how they can prevent flytipping (install or repair fencing, for example) and might be able to provide mobile CCTV or fixed CCTV if there is a power supply.

29.(a) Do you support the proposed actions to:

- Action 13.1: Conduct an evidence review of barriers to enforcement of flytipping offences?

~~Yes / No / Do not know~~

- Action 13.2: Initially raise current fixed penalties issued by local authorities, Police Scotland, Loch Lomond and Trossachs National Park for flytipping to the maximum (£500) and explore possibility of raising the maximum further at a later date?

~~Yes / No / Do not know~~

- Action 13.3: Explore the possibility and benefits of enabling local authorities and national parks to use civil penalties to enforce flytipping offences?

~~Yes / No / Do not know.~~

- Action 13.4: Explore raising current fixed monetary penalties that can be issued by SEPA for flytipping offences to the maximum (£1000) and explore possibility of raising the maximum further at a later date?

~~Yes / No / Do not know~~

- Action 13.6: Review existing legislative powers for enforcing flytipping offences?

~~Yes / No / Do not know~~

**(b) Please give reason(s) for your answers.**

13.1 It would helpful to ensure that a consistent approach is being taken across all relevant authorities and that the Fiscals offices are confident in the quality of cases and feel able to give these appropriate priority.

13.2 As with littering the penalty should be proportionate to the offence and not become a barrier to payment. Again, it might be appropriate to consider whether payments could be made in instalments.

13.3 It is not clear what civil penalties are being referred to and how these might be used.

13.6 The current legislation has been developed from the 1970s through to the 1990s so a review would be appropriate to ensure it remains cohesive and relevant.

**30.(a) Do you support proposed actions to:**

• **Action 14.1: Come to an agreement and develop guidance on role and responsibilities in enforcing flytipping offences?**

**Yes / ~~No~~ / ~~Do not know~~**

• **Action 14.2: Develop guidance on enforcement best practices, including on private land and seek for this to be voluntarily adopted by statutory bodies?**

**Yes / ~~No~~ / ~~Do not know~~**

**(b) Please give reason(s) for your answers.**

As with the previous response, these measures would serve to deliver a more consistent approach nationally, encourage cross agency collaboration, and encourage improved uptake of cases by the Procurator Fiscal.

**31. Are there any additional proposals you think should be considered for the National Litter and Flytipping Strategy?**

The focus of the proposed strategy is very much on preventing the acts of littering and flytipping but designing out the problem is not really discussed and there is more the government could consider in this sphere.

For example, the government has acted to ban certain single use plastic items which are commonly littered but not to prevent their replacement with single use items made from other materials. These will still be littered and contribute to this problem, but also have wider negative environmental consequences even if they are perceived as biodegradable.

This does need to be reviewed to see what can be done to change the behaviours associated with single use disposable items, e.g. dining in rather than takeaway,

carrying picnic cutlery in the same way as people have started to carry reusable cups, etc.

There is also scope to target some commonly flytipped items such as mattresses through producer responsibility measures, so that if you buy a mattress the retailer automatically provides an uplift and recycling service which you need to opt out of, rather than opt into and pay extra for.

In addition to tackling the harms associated with littering and fly-tipping would also serve to reduce carbon emissions and/or promote the delivery of a circular economy.

**32. (a) Do you agree that the accompanying Impact Assessments (BRIA, EQIA, ICIA, FSDA) are an accurate representation of core issues and considerations?**

**Yes / ~~No~~ / ~~Do not know~~**

**(b) If not, please provide detail and evidence.**

N/A

**33.(a) Do you agree with the recommendations and conclusions within the Strategic Environmental Assessment Environmental Report?**

**Yes / ~~No~~ / ~~Do not know~~**

**(b) If not, please provide detail and evidence**

N/A