

Respondent Information Form

Please Note this form **must** be completed and returned with your response to

Circular Economy Strategy Unit
Scottish Government
Area 3-H (South)
Victoria Quay
Leith, EH6 6QQ

Or

circulareconomy@gov.scot

To find out how we handle your personal data, please see our privacy policy:
<https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- ☐ Individual
☒ Organisation

Full name or organisation's name

Scottish Care

Phone number

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

- ☒ Publish response with name

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

- ☐ Publish response only (without name)
- ☐ Do not publish response

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?

X☒ Yes

☐ No

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

X☒ confirm

Vision and Outcomes

Question 1

To what extent do you agree with the vision and outcomes for the strategy?

- ☐ Strongly agree
- X ☒ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Not answered

Question 2

Do you have any comments on the vision?

Please add comments

Scottish Care agrees with the vision and outcomes outlined in the draft Circular Economy Strategy. The ambition to create a net zero and nature-positive Scotland through circular economy principles aligns with our commitment to sustainability and rights-based care. However, the vision should be supported by practical measures that reflect the realities of the social care sector. A sector which is funded largely by the government and as a result, is currently facing a sustainability crisis. Independent social care providers, responsible for over 80% of adult social care services, are closing at an alarming rate due to chronic underfunding and rising costs. Without targeted support to achieve this vision, care providers will struggle to implement circular practices effectively, risking further service reductions and loss of choice for individuals who rely on care. The vision needs to explicitly recognise the role of social care in achieving circular economy goals. Care services operate within tight budgets and strict compliance frameworks, so practical guidance and financial support will be essential. For example, clear protocols for safe reuse of medical equipment, funding for sustainable procurement, and integration with health and social care standards will help providers contribute meaningfully to this vision. This is particularly important given the sector's current financial fragility, evidenced by widespread late payments, reduced commissioning, and reliance on self-funded placements.

Question 3

Do you have any comments on the outcomes?

The social outcomes, fairness, inclusion, and community benefits, are particularly relevant to social care. Circular economy practices can reduce costs for care homes and community services, improve access to affordable goods, and create local employment opportunities. However, the strategy should explicitly reference care services as part of community wealth building. This is critical as many independent providers are small, family-run or women-led businesses rooted in local communities, which are currently at risk of closure due to unsustainable funding models. Care services act as economic anchors, supporting local supply chains and sustaining jobs in rural and urban areas alike. Including care services in community wealth building ensures that circular economy benefits, such as reuse, repair, and sustainable procurement are embedded in a sector that is both socially vital and economically significant. This approach will help strengthen local economies, create green jobs, and reduce environmental impacts while safeguarding the rights and wellbeing of people to rely on social care services. By prioritising care services within this framework, Scotland can deliver a just transition that is fair, inclusive, and rooted in the communities it serves.

Please add comments

Question 4

To what extent do you agree with the policy mechanisms identified?

- ☐ Strongly agree
- X ☒ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Not answered

Question 5

Do you have any comments on the policy mechanisms identified?

The policy mechanisms should state clearly that, because most social care is government-funded, commissioning and procurement must include the full cost implications of circular practices. Scottish Government should improve access to grant funding and practical support to enable providers to meet new requirements without compromising service quality. A sector-specific BRIA is needed to quantify impacts on providers, including staff time and training. Furthermore, Scottish Care supports the proposed policy mechanisms, including business support, skills development, and procurement reform. However, these mechanisms must be tailored to the realities of social care. For example:

- Business Support should extend Zero Waste Scotland's Business Hub to include care-specific guidance on safe reuse of medical equipment and sustainable procurement practices.
- Access to business support and the development of Guidance should be co-produced with the sector to mitigate unintended consequences and ensure that it is fit for purpose. For instance, most care providers are currently unable to access grants to support just transition because of technicalities in their contracts and registration.
- Skills and Education policy mechanisms should embed circular economy principles within health and social care training frameworks to prepare the workforce for these changes.
- Procurement policy mechanisms should provide templates for circular purchasing that meet Health and Social Care standards while remaining cost-effective.

Please add comments- Text box above

Question 6

Do you have any comments on the associated plans and priorities?

Please add comments

Plans should include pilot projects for reuse and repair in care settings, incentives for adopting circular procurement in publicly funded care contracts, and guidance on digital infrastructure sustainability given the sector's reliance on online systems. These priorities will help care providers overcome barriers and contribute to circular economy goals. Furthermore, plans and priorities must be underpinned by funding and support that reflect the realities of government-funded social care. We recommend a sector-specific BRIA to capture cost implications (infrastructure changes, compliance, staff time and training), and targeted grant schemes to ensure providers can implement circular practices sustainably.

Priority Sectors

Question 7

To what extent do you agree with the priority sectors identified?

- ☐ Strongly agree
- ☐ Agree

X ☐ Neither agree or disagree

☐ Disagree

☐ Strongly disagree

☐ Not answered

Question 8

Do you have any comments on the priority sectors identified?

Please add comments

The identified sectors are appropriate, social care intersects significantly with the built environment, textiles, and food systems. Many care homes operate in older or heritage buildings, making energy efficiency upgrades costly and complex. Bedding, uniforms, and other textiles are widely used in care settings, creating opportunities for reuse and recycling initiatives. Furthermore, food waste reduction is also critical in care homes and should be supported through practical guidance and funding. For the built environment, Scottish Care urges the provision of funding and technical support to overcome barriers posed by heritage restrictions and high retrofit costs. In energy infrastructure, care providers need affordable access to renewable energy solutions to meet net zero targets. For textiles, we support kerbside collection and repair initiatives, alongside measures to reduce fast-fashion reliance in staff uniforms. Transport plans should consider circularity in fleet management and route planning for home care services, while food system priorities should include tailored guidance for reducing food waste in care settings.

Question 8a

Do you have any comments on the plans and priorities for the built environment?

please add comments

Please see answer to q8.

Question 8b

Do you have any comments on the plans and priorities for the net zero energy infrastructure?

Please add comments

Please see answer to q8.

Question 8c

Do you have any comments on the plans and priorities for textiles?

Please add comments

Please see answer to q8.

Question 8d

Do you have any comments on the plans and priorities for the transport?

Please add comments

Please see answer to q8.

Question 8e

Do you have any comments on the plans and priorities for the food system?

please add comments

Please see answer to q8.

Product Stewardship

Question 9

Do you have any comments on the proposed approach to product stewardship?

Please add comments

Scottish Care welcomes the focus on textiles and mattresses, which are significant in care environments. We recommend adding medical equipment to the list of priority products, with clear safety protocols for reuse. This would help reduce waste and costs while maintaining high standards of care.

Circular Economy Monitoring and Indicator Framework

Question 10

Are there any changes or additions that you would like to suggest in relation to the Circular Economy Monitoring and Indicator Framework to ensure it is fit for purpose?

X ☐ Yes

☐ No

If yes, please specify below in relation to the framework as a whole and under the

relevant outcome sub-questions below if in relation to specific indicators/outcomes

The monitoring framework should include indicators relevant to social care, such as the adoption of circular procurement practices, reduction in care-related waste streams (textiles, food, medical equipment), and access to repair and reuse services for care providers. These measures will ensure the sector's contribution is visible and supported.

Question 10a

Do you have any comments in relation to the indicators proposed for outcome “The economic value derived from material use is maximised without increasing our environmental impacts”?

please add comments

Please see answer to q10.

Question 10b

Do you have any comments in relation to the indicators proposed for outcome “The Scottish economy is more resilient to disruptions in global supply of materials, including critical raw materials”?

please add comments

Please see answer to q10.

Question 10c

Do you have any comments in relation to the indicators proposed for outcome “Business and entrepreneurs have opportunities to develop circular economy innovations”?

please add comments

Please see answer to q10.

Question 10d

Do you have any comments in relation to the indicators proposed for outcome “Non-renewable resource extraction is minimised and renewable resource use is sustainable”?

please add comments

Please see answer to q10.

Question 10e

Do you have any comments in relation to the indicators proposed for outcome “The negative environmental impact of our production, consumption and disposal is minimised”?

please add comments

Please see answer to q10.

Question 10f

Do you have any comments in relation to the indicators proposed for outcome “The negative impacts experienced internationally from production, consumption and disposal are reduced”?

please add comments

Please see answer to q10.

Question 10g

Do you have any comments in relation to the indicators proposed for outcome “People and communities engage in and benefit from circular activities in a fair and inclusive way”?

please add comments

Question 10h

Do you have any comments in relation to the indicators proposed for outcome “Circular behaviours are the norm across business and society”?

please add comments

Please see answer to q10.

Question 11

Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment

please add comments

Circular initiatives must not increase costs for those who access social care services or create compliance responsibilities for providers of these services without financial support. For island and rural communities, logistical challenges in accessing reuse hubs must be addressed.

Question 12

Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment

please add comments

Question 13

Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment

please add comments

Question 14

Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact Assessment

please add comments

As most care and support is government-funded, the Scottish Government must factor in any cost implications when commissioning and procuring social care services. Transitioning to a circular economy will require investment in new practices, infrastructure, and compliance, and these costs cannot be absorbed by providers who are already operating under severe financial strain. Therefore, government should improve access to support and grant funding for the transition, ensuring care providers can participate without compromising service quality.

We also request that the Scottish Government undertake a Business and Regulatory Impact Assessment (BRIA) specific to the social care sector. This assessment should consider the full range of costs, including staff time and training required to implement circular economy practices. Without these measures, there is a risk that sustainability goals will exacerbate existing inequalities and lead to further service closures, undermining both social and environmental objectives.

Question 15

Please provide any further information or evidence that should be considered in the accompanying Consumer Duty Impact Assessment

please add comments

Question 16

Please provide any further information or evidence that should be considered in the Child Rights and Wellbeing Impact Assessment

please add comments

Question 17

Do you have any views on whether there are likely to be any positive or negative environmental impacts from the draft Strategy that have not been identified in the Strategic Environmental Assessment?

please add comments

The strategy offers positive environmental impacts through reduced waste and emissions from care operations. However, there is a risk that unfunded implementation could lead to cost pressures and service reductions. Adequate financial and technical support is essential to mitigate these risks.