

Delivering Scotland's Circular Economy – A Route Map to 2025 and Beyond

The Consultation paper is available on [GOV.SCOT](https://gov.scot).

Package 1: Promote Responsible Production

Question 1. To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use? Please provide evidence to support your answer if possible.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not answered

CTPA agrees that the Scottish Government should use its powers to promote responsible consumption, production and re-use. However, it must also consider the implications of this for sector-specific products.

To ensure the safety of consumers, there is a fundamental safety requirement under the UK Cosmetics Regulation for each cosmetic product to undergo a safety assessment performed by a duly qualified professional before it is placed on the market. Owing to hygiene and safety requirements, refill/reuse models are not always appropriate. This would be the case for certain cosmetic products. Businesses should not feel obliged to create unsuitable refill/reuse models.

Cosmetics and personal care products manufacturers are keen to use recycled and recyclable materials wherever possible, taking into consideration safety implications. However, the strict safety requirements necessary for cosmetics and personal care products and packaging mean that the detailed composition of the packaging must be known, and so in some cases, recycled packaging cannot be used.

CTPA would also like to emphasise the need for harmonised requirements across the UK and the Devolved Nations, including Northern Ireland, so that businesses may operate freely without excessive administrative burden, and are able to transport products to maximise efficiency and to help reduce the cost of the supply chain. If any actions are introduced, sufficient implementation times must accompany any new measures, and products already placed on the market should not be required to be withdrawn. This adds extra costs to companies already dealing with the requirements of Brexit and the effects of COVID, as well as having negative environmental impacts associated with unnecessary disposal.

If charges are set for environmentally harmful items, they must be proportionate to the likelihood of them being littered and harming the environment. CTPA has contributed to a Scottish Call for Evidence referencing sachets. Evidence of a problem with sachets used for personal care and cosmetic products in the UK is not clear. CTPA therefore requested that evidence is compiled on the contribution of sachets to plastic waste versus the benefits of their use, and that a consultation is conducted when such evidence is available. CTPA urges that any future legislative action must be based on robust science. Within the cosmetics sector, cosmetic products presented in sachets are designed for use in a domestic, mainly bathroom, setting rather than being used outside where they might more likely be littered.

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Furthermore, CTPA would like to emphasise that any reporting requirements that may be imposed as a result of new policies, should take into consideration the administrative burdens already placed on businesses, for example those imposed by the UK Plastic Packaging Tax (PPT) and upcoming Extended Producer Responsibility. The reporting requirements required for the UK PPT has been cumbersome and will continue to be time consuming for businesses moving forward. Businesses are required to collect data on packaging imported to the UK and then, in many cases, claim credits for what is subsequently exported. This process would be better served by reporting what is ultimately sold in the region. This learning could be applied to any potential reporting requirements that may come as a result of new policies.

Package 4: Improve Recycling from Commercial Business

Question 7. To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses? Please provide evidence to support your answer if possible.

- Strongly agree
- Agree
- **Neither agree nor disagree**
- Disagree
- Strongly disagree
- Not answered

CTPA supports the Scottish Government's plans to conduct research into commercial waste and help businesses to reduce waste.

The cosmetics and personal care industry recognises the need to transition to a circular economy, and it has been working to improve the circularity of small packaging formats that cannot be recycled kerbside, by setting up take-back schemes. Already, take-back schemes are accessible to more than 75% of the UK population through a number of retail outlets, and it is expected that the use of take back-schemes will continue to grow.

CTPA would welcome engagement with the Scottish Government to discuss the role of take-back schemes in achieving a more circular economy.

Package 6: Minimise the Impact of Disposal

Question 11. To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste? Please provide evidence to support your answer if possible.

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not answered

Package 7: Cross-Cutting Measures

Question 13. To what extent do you agree with the measures proposed in this package to support action across the circular economy? Please provide evidence to support your answer if possible.

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- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not answered

CTPA supports a science-based, evidence-led approach to the measures proposed in this package to support action across the circular economy.

2025 and Beyond

Question 15. To what extent do you agree with the principles proposed to underpin future circular economy targets? Please provide evidence to support your answer if possible.

CTPA supports the Scottish Government's plans to achieve a circular economy. However, CTPA would also like to emphasise the need for harmonised requirements across the UK and Devolved Nations, including Northern Ireland, so that businesses may operate freely without excessive administrative burden, and are able to transport products to maximise efficiency and to help reduce the cost of the supply chain. Likewise, many UK businesses supply both the domestic and the EU market, therefore these comments are also applicable to the impact of potential divergence from EU policies and legislation.