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Response to the Consultation on Safeguarding Scotland's Resources

Dear Mr Chant,

Marks & Spencer is one of the UK's leading retailers of high quality clothing, food and homeware with over 70 stores in Scotland.

In 2007, we launched our Plan A sustainability programme designed to address the key environmental and social challenges for the retail sector which include 26 targets on waste. These targets addressed waste in our own operations, in the homes of our customers and in our supply chains.

We believe that we've have gained valuable experience and made good progress. We've reduced our own waste arising by 41% and send none to landfill. We've reduced packaging by 26% and Food carrier bag usage by 78% as well as launching a major clothes re-use partnership with Oxfam, recently re-launched as 'shwopping'. We are also working with our suppliers through our Supplier Exchange programme to help them to reduce waste too.

In addition, we also participate in a range of collaborative agreements such as the Courtauld Commitment and Sustainable Clothing action Plan.

We support the Scottish Government's target-led approach (reducing waste by 5% by 2015 and 15% by 2015) and have responded to the thirteen detailed proposals set-out in Safeguarding Scotland's resources below:

Business efficiency

- 1. We support the proposal to combine the services** of The Carbon Trust, Energy Savings Trust, and Zero Waste Scotland into a single organisation. In the current economic environment, it is important that the quality of advice and support for business (particularly SMEs) is maintained and improved. Our experience in working with our suppliers suggests that a more streamlined and co-ordinated one-stop service could be more efficient and effective.

2. We **support** the proposal for continued support for existing voluntary collaborative initiatives such as the Courtauld Commitment and Federation House Commitment which operate in Scotland and across the UK.
3. We **support** the proposal for zero waste pledges but that ambition of the pledge should be attainable and must not create additional administrative burdens. For example, by requiring companies to collate separate data relating to operations in Scotland. The concept of zero waste is too theoretical and unrealistic for many sectors and we would consider significant reductions and 100% re-use or recycling to be more motivating 'stretch' targets.
4. We **support** the proposal to reduce construction waste though the existing 'Halving Waste to Landfill' collaborative agreement. We agree that actions should extend to include best practices in architectural design and construction techniques.
5. We **support** the proposal to improve the quality of data through the introduction of electronic tracking systems and Duty of Care documentation. However, this should not incur additional costs to business by requiring the provision of different or more detailed data than is already collated.
6. We are **not qualified to comment** on proposals for voluntary agreements with the waste industry although we support engagement with this sector.

Products and packaging

7. We **support** the proposal to promote sustainable design of products and services. However, it is a challenging area for any one government to address given the global nature of product development and sourcing. We believe that involvement in initiatives such as the WRAP convened Product Sustainability Forum provide the best opportunities to work collaboratively with retailers, brands and manufacturers to overcome barriers to action.
8. We **do not support** the proposal to amend Producer Responsibility legislation to collect separate packaging data for Scotland. Separate national data collation will generate significant additional costs and will be of limited value in influencing design as the majority of products are developed for European-wide or global markets. The development of specific packaging solutions for Scotland is not generally viable and data flows to track material types and volumes can be 'modelled' or measured at the point of processing. We also believe that it is inappropriate to introduce additional tracking mechanism to define Scottish PRNs.

We believe that packaging deposit schemes are an expensive and inefficient means of collecting recyclable materials - as quantified by many Government sponsored pieces of research including the 2008 comprehensive review conducted by ERM Ltd. Good standards of domestic and 'out of home' (i.e. where the drinks are consumed) collections can provide more efficient and convenient forms of collection.

9. We **support** the proposal to increase re-use with a focus on furniture, electrical items and clothing. We believe that opportunities already exist though the Furniture Re-use Network and the Sustainable Clothing Action Plan. We believe it will be useful to collect data on re-use but as it sits outside documented 'waste' it maybe difficult to achieve with any degree of accuracy.

Influencing behaviour

- 10. We support the proposal to introduce a carrier bag charge in Scotland.** M&S introduced a 5p charge in our food sections in 2008 which achieved a reduced of 80%. The subsequent introduction of a mandatory minimum charge in Wales in October 2011 resulted in a further 10% reduction on Food bags plus a 70% reduction on General Merchandise bags. We believe that carrier bag charge legislation should (i) apply to all types and material of single-use carrier bag, (ii) be set at the minimum level to change behaviour, (iii) allow proceeds to be donated to charitable causes, (iv) require transparency on carrier bag usage and donations.
- 11. We support the proposal to support community-led waste activities.**
- 12. We support the proposal to develop guidance for Local Authorities on waste collection systems.** We welcome the proposed focus on food waste and re-use to complement revisions to waste legislation requiring the separate collection of dry recyclables and food waste.
- 13. We support the proposal for public bodies to 'lead by example' on waste prevention and sustainable procurement.**

Yours Faithfully

Rowland Hill

Sustainable Development

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