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**22<sup>nd</sup> August 2022**

Via Email to: [circulareconomy@gov.scot](mailto:circulareconomy@gov.scot)

**GS1 UK Response to: Delivering Scotland's circular economy: A Route Map to 2025 and beyond**

GS1 UK is one of 116 politically neutral, not-for-profit GS1 organisations. Since 1969 our standards have formed the backbone of the global business language that identifies, captures, and shares key data on products around the world seamlessly and without friction – the best known of these standards being the barcode.

That means that from product barcodes to patient wristbands, our standards have the power to deliver change now and in the future, making a real difference to businesses and wider society.

We welcome the opportunity to respond to this consultation. Reaching a circular economy by 2025 presents a robust challenge for industry, policymakers and consumers, however we feel that with the right data systems underpinning it, this is entirely achievable.

It is important to stress the GS1 UK is a politically neutral, not-for-profit organisation that has a long history of bringing industry around the table in a non-competitive way, to resolve challenges and issues. Given the size of the challenge ahead and the pressing need for action in this area, we believe that we have a critical role to play in enabling both industry and the consumer to complete the journey towards creating a circular economy.

We trust that you find out comments below helpful.

If you have any additional questions or queries, please contact our Head of Policy using the details at the end of this document.

Kind regards,  
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**Q1 & 2: To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and reuse and are there any further measures that you would like to see included in the Route Map to promote responsible consumption, production and reuse?**

We agree that these measures go some way to achieving these goals, however the measures could go further, especially in supporting consumers.

Visibility of data is key for product stewardship. Having a mechanic for collecting this information and making it visible for consumers at all points in the products lifecycle is crucial for success. GS1's open, interoperable standards are critical to ensuring product stewardship is backed by universally recognised data, from production to consumption and through to disposal/recycling, and re-use.

Open standards provided by GS1 are essential to enabling accurate data to be captured so local authorities have a clear picture of waste quantities and materials, recycling rates per material and brand, onward tracing and re-use. GS1 Standards are already being piloted for waste tracking and sorting in Wales, through industry collaboration, local authority support and technology. This will reduce the possibility of fraud or reporting mistakes, allowing accurate event tracking such as collections, MRF receipt and processing, as well as recycling rates.

In addition, the ability for brands and manufacturers to be able to communicate effectively with consumers around responsible consumption (whether related to waste, sustainability or health) is paramount in enabling consumers to make informed choices around purchase, consumption and disposal. This can be achieved through the adoption of QR codes on pack combined with GS1 Standards for product identification which will connect consumers digitally to key information unique to that product thus enabling them to easily make informed choices.

**Q3: To what extent do you agree with the measures proposed in this package to reduce food waste?**

As the UK Gov is looking to establish a Food Data Transparency Partnership, a mandate on open standards for data collection will be a useful way in which to capture data on surplus food waste.

The GS1 GTIN (Global Trade Item Number, widely used by the industry) could effectively allow businesses to report on food waste, for example unsold goods.

Improvements to data collection and reporting through open standards can also be used to support the introduction of reporting on food surplus and waste, reducing the burden on businesses and providing actionable insights for future developments and evolution. This would provide unparalleled opportunities regarding both consumer safety information, as well as traceability across the food supply chain, resulting in granular data around waste, disposal, recycling and reuse.

Furthermore, GS1 UK are actively championing the importance of the consumer in any public waste strategy. The new research from GS1 UK investigates consumer behaviour, motivations, and gaps around recycling and waste disposal. As key players in this space we are well placed to support the above consumer engagement strategy and ensure that value is felt by all parties across consumers, industry and legislators.

#### **Q4: Are there any further measures that you would like to see included in the Route Map to reduce food waste?**

Throughout not only our route map to reduce food waste, but also our drive to reach a circular economy, Government must avoid the potential pitfalls of duplication and confliction of data standards.

Not only does this present difficulties for consumers (which can create risks around adoption) but it also means that it becomes almost impossible to analyse.

Our global data standards have formed the backbone of the global supply chain by identifying, capturing, and sharing key information on products around the world seamlessly and quickly – the best known example of this being the barcode. Online, in store and across hospital wards GS1 standards are revolutionizing the way information is identified captured and shared. This enables trusted data upon which decisions can be made and action taken.

GS1 UK well placed to support the delivery of the Food Data Transparency Partnership. Involvement of GS1 UK from the start of this process will avoid duplication of efforts, process and practice thus avoiding unnecessary business costs and complexities.

#### **Q5: To what extent do you agree with the measures proposed in this to improve recycling from households?**

Relevant information needed for effective recycling, such as product material, disposal routes, destination, and more, can be easily communicated through GS1 standards. For example, this can be done through using a QR code on pack with an embedded GS1 GTIN (Global Trade Item Number, widely used by the industry).

This will allow consumers to quickly and accurately seek information related to that specific product in one scan of a smartphone in a nation where 90% of the population are active smartphone users (Deloitte 2019) . Not only would this give consumers relevant and essential information regarding the correct recycling practice for an item, but could also detail the journey that the recycled packaging could have in further reuses.

This data can be leveraged by all parties including local authorities, thus enabling easier reporting on a local and national level. Also, adding 2D codes on pack, wherever possible, would future-proof product and waste tracking, ensuring these measures can more effectively integrate with future technology and comply with more granular reporting requirements.

**Q7 & 8 : To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses, and are there any further measures that you would like to see included in the Route Map to improve waste recycling from commercial businesses?**

The success of waste recycling relies on industry and nations using open, interoperable standards which will allow for such systems to work in harmony across 4 nations and the commercial parties which trade across all 4 nations of the UK. This is particularly true with regards to commercial business waste recycling, as many businesses operate across all 4 nations of the UK.

Divergence across nations will increase complexity, decrease efficiency and add costs which will be passed on to consumers. A key example of this is DRS. The lack of a four-nation approach is creating complexity and barriers, which is generating a negative view of the scheme implementation, due to higher costs and the impact that will have on consumers, particularly during the current cost of living crisis.

Businesses having to operate across multiple schemes will likely reduce range and choice to the customer as well as adding on any cost of doing business to price at shelf. Whilst there may always be an immediate cost to reduce environmental impact, adopting a common approach and interoperable standards will reduce complexities and associated costs, and accelerate business and consumer compliance.

**Q9 & 20: To what extent do you agree with the measures proposed in this package to embed circular construction practices and, Are there any further measures that you would like to see included in the Route Map to embed circular construction practices?**

We agree with these measures, but the construction sector in particular is far from optimal in terms of digitalisation and traceability to enable circular practices. A "Golden Thread" throughout construction supply chains is greatly needed to trace products and services through their lifecycle. GS1 standards can help achieve this,

and enable a truly circular lifecycle of products, services and waste within construction.

Consumers, businesses, and governments want reliable information about the sustainability of their products and services. Product packaging, the provenance of raw materials and the identification of chemical substances are particularly important issues. GS1 provides a common set of standards to share sustainability information widely, both for B2B and B2C purposes. Our standards can also support green procurement in both the public and private sectors.

GS1 Standards can play a role in supporting mandatory compliance i.e. enforcement is easier if information on materials (source, material type, manufacturer) is readily available to public agencies. We are currently liaising with the construction industry to support the adoption of the GS1 Standards in the construction sector with a key focus within the supply chain.

Collaborating with industry by ensuring information on material type is readily available using open standards, ensures that materials can be reused, recycled or disposed of appropriately. This also opens the possibility of capturing data on 'disposal' route – i.e. reuse, recycle or dispose – making it easier for construction companies to know what to do. The use of open standards could be implemented through the Scottish Programme for Reuse of Construction Materials and Assets.

The ongoing work includes an action on mandating for 'design for deconstruction' through building standards. Again, there's a possibility of using open standards to ensure that any newly designed building that is designed for deconstruction captures all the necessary information on materials used and what to do with them.

**Q11: To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste?**

We agree with the proposed measures, however we feel that these can be improved and enabled by using open interoperable GS1 data standards.

**Q12: Are there any further measures that you would like to see included in the Route Map to minimise the impact of disposal?**

GS1 UK can lend expertise on using open standards to ensure that accurate data on product and packaging information is used to ensure that waste materials are sorted and disposed of correctly as part of a Residual Waste Plan.

Given GS1 UK's role in industry as a neutral not for profit membership organisation and our expertise in this area, we would welcome the opportunity to sit as part of the advisory panel, providing industry with standards and data led solutions and facilitate the bringing of industry together in a non-competitive, collaborative space.

**Q13: To what extent do you agree with the measures proposed in this package to support action across the circular economy?**

Visibility and digitisation of product data are key for circular economy. Having a mechanism for collecting, storing and updating this information and making it visible for consumers at all points in the product's lifecycle is crucial for success. Without this, there is a real risk that even the best planned policies fail to connect with the public, and the opportunity is lost.

GS1's open, interoperable standards already underpin the movement of products through their supply chains all the way to transaction and this is increasingly becoming digitised through digital supply chains developments and within the world of ecommerce therefore it makes sense that GS1 standards continue to be at the heart of circular economy ambitions. This prevents duplication of time, resource and efforts on behalf of businesses.

Whilst these measures are needed, their effectiveness and progress monitoring will depend on accurate, open and interoperable data. Open standards can be used to support progression towards circular economy targets. GS1 standards capture accurate data on product information, which can be used to both set and measure targets as products/materials move through the supply chain.

**Q14: Are there any further measures that you would like to see included in the Route Map to support action across the circular economy?**

It is important that the Scottish Government work with the Food Data Transparency Partnership. In this context, a mandate on open standards for data collection could be a useful way in which to capture data on surplus food waste, maximising a collaborative approach. Improvements to data collection and reporting through open standards can also be used to support the introduction of reporting on food surplus and waste, reducing the burden on businesses, and therefore consumers.

The GS1 GTIN (Global Trade Item Number, widely used by the industry) would effectively allow businesses to report on food waste, for example unsold goods.

Whilst this application would start at an earlier stage for the wholesale industry, GS1 UK has engaged with the FWD and FSA for nearly two years, and we have published an initial report together on the need for data standards in the industry.

**Q15: To what extent do you agree with the principles proposed to underpin future circular economy targets?**

GS1 standards can support the principle of reducing the material footprint of our resources and waste by capturing accurate product, material, collection, sorting, disposal and recycling and reuse information. This data can be used to both set and measure targets as products/materials move through the supply chain.

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GS1 UK has brought together industry for decades, with dedicated user groups to facilitate collaborative industry-backed solutions using open standards across all elements of the supply chain. Being a global organisation, our standards are used in most countries and crucially, in similar schemes in the EU, for example DRS, thus making any data easy to communicate and share both across the UK but also the EU and beyond.

We hope that you have found our comments helpful. If you have any further questions, please do get in touch using the details below.

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