

A Draft Circular Economy Strategy for Scotland – Consultation Response from the Charity Retail Association – January 2026

Question 1: To what extent do you agree with the vision and outcomes for the strategy? [Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Neither agree nor disagree.

Question 2: Do you have any comments on the vision?

The vision would be enhanced by the inclusion of volunteering and the role of charities and social enterprises in the circular economy.

The vision references “people, businesses and the public sector” with no mention of the voluntary or third sector, despite Scottish charity retailers being world leaders in reuse, especially for clothing. It is essential that the vision clearly acknowledges the contributions of the not-for-profit sector.

Question 3: Do you have any comments on the outcomes?

The outcomes reference the importance of job creation but do not mention the value of volunteering. There are around 16,700 people in Scotland volunteering in charity retail who are powerful advocates for reuse. Volunteering plays an invaluable role in growing the circular economy, generating economic activity, and supporting strong communities.

The current outcomes fail to recognise both the role of the charity sector in the circular economy and its potential to expand, the importance of the funds raised for funding good causes in Scotland, and the role of volunteers.

Charity retailers generate economic growth through the circular economy, but this draft strategy does not harness the potential to build on this.

We note some of the negativity around used clothing exports and would urge a balanced approach that recognises the extensive social and economic benefits of used clothing exports to other nations. We have been partners in setting up a certification scheme (TRUST), which audits the UK operations of merchants exporting clothing for reuse and checks that they are undertaking due diligence on their overseas partners. We would welcome support to develop the certification further.

Question 4: To what extent do you agree with the policy mechanisms identified? [Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Agree

Question 5: Do you have any comments on the policy mechanisms identified?

An overarching point is that the policy mechanisms are lacking in ambition and, on their own, will be insufficient to deliver the strategy's vision.

We would welcome an additional policy mechanism to provide support to charity-led reuse initiatives. Charity retailers have the expertise and infrastructure that can be scaled to boost collection and reuse rates of products such as clothing, used electrical items, furniture, and a variety of other items commonly sold in charity shops.

Question 6: Do you have any comments on the associated plans and priorities?

We particularly welcome the priorities on consumer behaviour change and procurement.

In relation to behavioural change plans, a systems-wide approach is required to encourage consumers to buy second-hand and to donate goods that they have finished using. This could be delivered via communication campaigns and the realignment of regulations and publicly funded infrastructure to support the second-hand market.

In relation to public procurement plans, a second-hand first approach should be adopted when purchasing products and where support is being provided to citizens, then the new nationwide Charity Shop Gift Card should be utilised as one means of doing this so that recipients have the option of buying second-hand items.

In relation to the Circular Economy Data plan, we note that it focuses on measuring waste volumes. This must be supplemented with targets for reuse volumes.

In relation to the Place-based approach plan, we would highlight the importance of ensuring a degree of consistency between areas. Too much variation in approach would be confusing for the public and would also make it harder for charities with shops across Scotland to participate and cause confusion for the public.

**Question 7: To what extent do you agree with the priority sectors identified?
[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]**

Agree

Question 8: Do you have any comments on the priority sectors identified?

Of the five priority sectors, we strongly support the inclusion of textiles and believe this must include an Extended Producer Responsibility Scheme for textiles. Between 8% and 10% of all global greenhouse gas emissions currently come from textile production, and this could be significantly reduced with a focus on increasing clothing reuse and improving production processes to support durability and the use of recycled materials.

Question 8c: Do you have any comments on the plans and priorities for textiles?

We agree with the proposal to work with the sector to develop a roadmap. However, we note that there is no definition as to who constitutes the “sector”. The sector should be defined to include reuse organisations and, in particular, charity retailers. A roadmap developed solely with fashion brands and commercial retail brands would be unlikely to prioritise reuse, as this is not where their focus or expertise lies.

We agree with the proposal to align with the EU approach, and this makes the most sense in relation to the adoption of eco-design and durability standards along with product passports. In addition, we are generally supportive of a ban on the disposal of unsold brand-new consumer goods unless it can be shown that they are unsafe for sale or there is no market demand for the items.

The management of post-consumer textile products would be improved through effective partnerships with charity retailers. The proposal to require local authorities to collect used textiles as part of regular doorstep waste collections, however, risks harming charity shops by diverting items away from them. It also risks harming the environment by diverting items away from the reuse options provided by the charity sector at no cost to taxpayers and towards recycling or, where the recycling market is saturated, towards incineration.

Where local authorities are operating their own textile collection services their should be a requirement for full transparency showing the volume of textiles that are reused, the volume that are recycled and the volume which are sent for incineration.

Textiles are best collected by being brought into charity shops, sent via the post or donated in textile banks, as these methods keep clothing dry and avoid contamination, meaning reuse potential is preserved.

Finally, we agree with promoting sustainable alternatives to fast fashion, whether this is buying items second-hand, buying items that remain in use for longer or items which are made from recycled content.

Question 9: Do you have any comments on the proposed approach to product stewardship?

We welcome the intention to include textiles and the commitment to ensure items are managed in accordance with the waste hierarchy. In relation to clothing, much of what is discarded is suitable for reuse, and it is important that policies and systems are supported to ensure that re-wearable clothing is separated out for reuse rather than being sent for recycling or incineration. Consumer awareness campaigns have a role to play in helping consumers to know what to do with good-quality used clothing to maximise the possibility of reuse.

A priority must be the implementation of an Extended Producer Responsibility Scheme for textiles that includes:

- Durability standards

- Support for charities/ merchants in handling non-wearable textiles
- Overseas market support
- Public marketing campaigns eg. buy second-hand/ donate
- Eco-modulated fees

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”?

The proposed measure here focuses on jobs and whether people have access to circular economy services, neither of which measures general consumer engagement in the circular economy. To truly measure consumer engagement in the circular economy, additional measures are required, including reuse volume targets and the proportion of consumers actively buying second-hand items. It would also be beneficial to track the number of volunteers working within the circular economy to support the communication campaigns to promote volunteering and support the extension of training opportunities to volunteers.