



COMHAIRLE NAN EILEAN SIAR

Draft Waste Strategy 2025-2030

Purpose

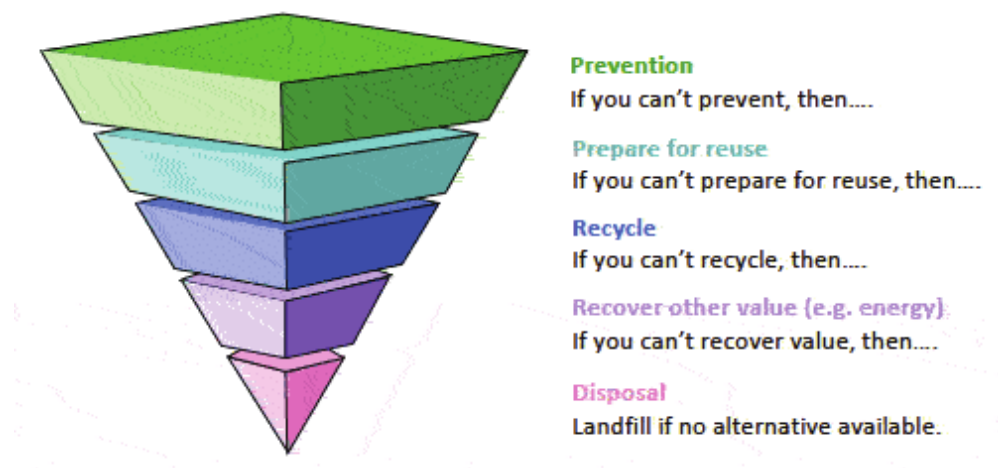
The Waste Strategy aims to deliver a sustainable, cost-effective waste management system that aligns with Scotland's Circular Economy and Waste Route Map to 2030 whilst addressing island and geographic constraints, limited recycling markets, and rising operational costs. It incorporates planned and potential legislative and policy changes that will impact on how waste is managed.

Scope

The Strategy covers the collection, recycling, reuse and disposal of household waste and the disposal of certain commercial and industrial waste for the period 2025-2030.

Vision

To have a sustainable, efficient, cost effective and environmentally friendly waste management system, that minimises waste, maximises resource recovery, and supports the circular economy in line with the waste hierarchy.




Objectives

- Comply with the Biodegradable Municipal Waste (BMW) ban on 1 January 2026.
- Improve the collection and reporting of waste data information.
- Increase household recycling rate aiming for an aspirational 70% by 2030.
- Promote a circular economy by supporting reuse and waste prevention in island communities.
- Utilising any Extended Producer Responsibility payment offsets to improve recycling services and infrastructure.
- Review waste streams following the introduction of the 2027 Deposit Return Scheme (DRS).
- Comply with Scotland's net-zero goals.
- Ensure affordability by balancing compliance with financial sustainability.

Profile

Comhairle Nan Eilean Siar is the local authority for the Outer Hebrides, which comprise a chain of islands connected by bridges, causeways and two ferries.

Area: 3,056 km²
Coast Line: 2,700 km



The islands stretch for about 130 miles North to South with the widest point being about 37 miles.

The main population centre is Stornoway in Lewis with other smaller population centres and numerous smaller villages spread throughout the island chain. It has the lowest population density (<9 people per km²) in the UK, which combined with its being a linear island chain makes it expensive to collect and dispose of waste compared to other local authorities.

These islands have a resident population of 26,120 and the Comhairle collects and disposes of household waste from the kerbside of 14,600 households and businesses.

Area	Population	Households
Lewis & Harris	20,172	10,130
Uist and Barra	5,948	2,906
Total	26,120	13,036

Waste collection and disposal is carried out differently across the island, summarised as below:

Method	Description	Lewis	Harris	Uists	Barra
Kerbside Collection	Mixed Municipal	3 Weekly	3 Weekly	2 Weekly	2 Weekly
	Co-mingled Recyclables	3 Weekly	3 Weekly		
	Glass	9 weekly	9 weekly		
	Paper & Card			4 Weekly	4 Weekly
	Plastic & Can			4 Weekly	4 Weekly
Waste Facilities	Landfill Site	Bennadrove			
	Waste Treatment	Anaerobic digester Creed		Biological treatment Market Stance *May 2025	
	Waste Transfer Stations	Creed		Market Stance	
	Household Waste Recycling Centres (HWRC)	Creed (CNES) Habost	Urgha	Rueval (CNES)	Garrygall
Bring Sites (skips)	Glass and Dry Recyclables	Various locations	Various locations	Various locations	Various locations

In 2024, the Comhairle landfilled around 14,200 tonnes and recycled/reused around 7,800 tonnes of waste achieving a 35% recycling rate. It's 2023 official household recycling rate sits at 35.1%, which is an increase of 3.3% from the recycling rate of 31.8% for 2022. Although this remains the fourth lowest in Scotland, this is significantly higher than other island authorities, Shetland (20.7%), Orkney (21.4%) and is just below Highland (36%), West Dunbartonshire (36.2%), Dundee City (36.6%) and City of Edinburgh (38%).

FINANCES

The Comhairle spent about £5 million to manage waste in the Outer Hebrides in 2024/25 (£7.2 million cost with £2.3 million income) and whilst it has a similar budget for 2025/26 these costs will rise significantly due to an increase in landfill tax and the introduction of the BMW ban on 1 January 2026 (£300,000-£750,000 per annum).

There are also additional capital costs for creating and restoring landfill cells with £5 million being allocated from the 2023-2028 Capital Programme for Bennadrove landfill site.

The Comhairle receive approximately £2 million for the collection and disposal of waste from the Local Authority annual settlement for 2025/26; however, does receive income through other sources such as rates and Council tax as well as income from commercial waste charges.

The Comhairle have been provisionally allocated £3.4 million for 2025/26 from the EPR scheme but this is still to be confirmed by the scheme administrator, PackUK.

External Drivers & Key Challenges

The following external drivers will influence the Comhairle's directions for waste management over the next five years.

SCOTLAND'S CIRCULAR ECONOMY AND WASTE ROUTE MAP TO 2030

The Scottish Government is committed to moving towards a circular economy and playing its part to tackle the climate emergency. The Circular Economy and Waste Route Map aims to drive progress on three fronts:

- Sets the strategic direction and lay foundations for how the vision for Scotland's circular economy will be delivered from now to 2030 using the powers from the Circular Economy (Scotland) Act 2024.
- Sets out priority actions from now to 2030 to accelerate more sustainable use of resources across the waste hierarchy.
- Reduce emissions associated with resources and waste, including some of the opportunities to decarbonise the waste sector, ahead of the next Climate Change Plan (CCP).

Measures in this Route Map are grouped under four strategic aims, which reflect the span of the waste hierarchy or each strategic aim, they set out priority actions and further actions to be achieved before 2030.

The Route Map sets out strategic direction for delivering a system-wide, comprehensive vision of Scotland's circular economy from now to 2030 and aims to strengthen the circular economy by modernising recycling and decarbonising disposal.

It is anticipated that the Route Map will allow the development of new guidance for all recycling and waste targets (some of which are highlighted below). Substantial progress has been made to ensure that the views from an Island local authority perspective are considered to ensure that targets and measures that may be appropriate for a mainland authority are deliverable and affordable for an island local authority.

BIODEGRADABLE MUNICIPAL WASTE (BMW) BAN

The ban on BMW to landfill comes into force on 1 January 2026 resulting in the Comhairle stopping landfilling all kerbside collected non-recyclable/residual waste and bulky household waste that contains Biodegradable material. The estimated amount of Western Isles waste covered by the ban is around 8,000-9000 tonnes.

From May 2025 a biological treatment process plant, designed to break down the biodegradable content of waste, will be installed at Market Stance in Benbecula. This will treat around 3,000 tonnes of BMW, primarily from Uist and Barra. As Uist and Barra do not have a separate food and garden waste collection, the process is expected to reduce the volume and weight of the waste by up to 50%. The output will be sent to the mainland as a Solid Recovered Fuel (SRF). As SRF performs better as a fuel than untreated residual waste, the mainland gate fee will be significantly lower.

Although the SRF will require transport to the mainland by ferry, the volume of waste will be reduced by up to 50%, requiring less journeys, and there will be significantly less demand for the transport of waste on the Sound of Harris ferry.

The produced SRF may also meet the AT4 standard which would allow it to be landfilled. Whilst Lewis and Harris (L&H) has a separate food and garden waste collection it is proposed to trial Lewis and Harris residual waste in the plant to test the resulting waste for volume reduction and AT4 compliance. This would confirm if this treatment would be a viable option for Lewis and Harris post 1 January 2026. Although this doesn't necessarily align with the target to reduce material landfilled it may be the most cost effective option to achieve compliance for the islands.

The current proposals are to ship the Lewis and Harris residual waste by road and ferry to mainland energy from waste (EfW) facilities. This will create significant additional costs to the Comhairle and put additional

capacity pressures on the already limited Stornoway - Ullapool ferry route, especially during the summer months.

Waste diverted from landfill will not attract landfill tax (but it is looking likely that EfW will be subject to future emission trading schemes and associated costs) and there will be non-revenue savings associated with extending the lifespans of any landfill cells.

The additional annual revenue costs of shipping 6000 tonnes to the mainland, depending on haulage costs, tonnage per load and gate fees, could range from £500,000 to £750,000. The capital saving from extending the life of the landfill cell is estimated to be around £500,000 per annum.

The Comhairle will continue to consider other accepted waste disposal options but recognise that some recognised technologies, like energy from waste, are currently not suitable or cost effective for the volume of waste produced in the islands. The carbon footprint and type of energy that can be used will also be considered in any options appraisal.

EXTENDED PRODUCER RESPONSIBILITY (EPR)

Extended Producer Responsibility (EPR) is a policy approach that shifts the responsibility for managing a product's end-of-life disposal from local authorities to the producers who manufacture or import the goods. For packaging, EPR requires producers to cover the full net costs of collecting, sorting, treating, and recycling household packaging waste. This includes funding the management of packaging waste from households, while encouraging producers to design more recyclable and sustainable products.

It is estimated that the Comhairle will receive £3.4 million in 2025/26 from producers (via the scheme administrator PackUK) to cover the costs of managing household packaging waste. The methodology for calculating the payment is based on submitted waste data from 2021/22. Whilst the methodology is not fully transparent, it does recognise the increased costs for dealing with waste in an island setting and has a meaningful rural uplift to reflect this.

This money is not ringfenced, but the fee is expected to cover the *"full net costs of efficient and effective local authority household packaging waste collection and disposal services"* so payments from 2026/27 onwards may be considered in that context when local authority annual settlements are decided. There will be new calculations annually and PackUK may be able to deduct payments if they determine overpayment have been made in previous years.

The goal is to improve recycling rates and reduce waste, aligning local efforts with broader environmental targets, while producers foot the bill, however producers will be wanting evidence that the money has been spent correctly therefore there will be a greater need going forward to have accurate, transparent data to show how the Comhairle is collecting and disposing of waste and how it correlates to EPR funding.

It is proposed to use some of the £3.4 million EPR money, if provided, to

- fund the increased costs associated with the BMW ban to landfill
- improve and replace equipment that will help recycling and recovery rates at both Comhairle and community facilities
- look at ways to improve waste data management and reporting
- look at improved engagement and education with residents and businesses to encourage the reduction, reuse and recycling of waste.
- Carry out a waste compositional analysis.

DEPOSIT RETURN SCHEME (DRS)

The previous Scottish DRS set to be introduced in 2024 was postponed. A Deposit Return Scheme is still expected to be introduced in 2027. This will be a UK wide system and will not include glass in Scotland, England and Northern Ireland. The introduction of DRS would be beneficial to the Comhairle as there are currently no financial benefits from the recycling of drinks containers due to the prohibitive cost of shipping materials to the mainland. For many other local authorities in Scotland, collection and recycling of these materials provides an income stream and significant net savings when compared to landfill disposal.

Depending on the volume of material taken out by the DRS, kerbside household collections may need to be reviewed.

NEW HOUSEHOLD RECYCLING CODE OF PRACTICE

The Scottish Government's Circular Economy & Waste Route Map prioritises the co-design of a new household recycling Code of Practice. This new Code of Practice will be mandatory and lead to more consistency of services in Scotland.

This could have a significant impact on waste management so the Comhairle will feed into discussions about the new code to ensure the island impacts are fully considered with requirement being manageable and cost effective.

POTENTIAL NON-MUNICIPAL BIODEGRADABLE WASTE BAN TO LANDFILL

The potential extension of the upcoming ban on landfilling biodegradable municipal waste to include other non-municipal biodegradable waste material such as waste streams from industrial and construction sources will have limited impact on the Comhairle directly, but may have a wider impact on the business sector and on ferry capacity if more waste has to be transported to the mainland. The Comhairle will have to consider whether it would look at incorporating these waste streams, where feasible, into any solutions it has for its own collected BMW.

RURAL FOOD WASTE EXEMPTION

Local authorities are required to provide segregated food waste collection to householders and separately requires all food businesses producing more than 5kg food waste a week to ensure the separate collection of food waste unless the rural exemption applies. The potential removal of the rural food waste exemption would have a significant impact on the islands.

The Comhairle will continue to argue that the exemption should apply across the whole of the Outer Hebrides as the cost, energy and carbon footprint for collecting food waste separately would far outweigh any gains from recycling this material separately. Food waste is already collected as part of the organic stream in Lewis and Harris and treated locally at the Creed Park Anaerobic Digester.

EXTENSION OF THE WASTE UPHOLSTERED DOMESTIC SEATING (WUDS) CONTAINING POPS TO SIMILAR PRODUCTS.

The use of flame retardants for upholstered furniture that contain Persistent Organic Pollutants (POPs), has required that any product categorised as WUDS is sent to the mainland for incineration. The costs for the first year of this new obligation are over £38,000. Although not yet confirmed, there may be additional items of household waste, such as carpets and mattresses, that could be added to the POPs list in future. No additional funding support has been made available to assist with this additional cost of compliance.

KEY SCOTTISH WASTE TARGETS

The Scottish Government will set new circular economy targets by 2027, until then the following targets are still a benchmark for local authorities.

70% Recycling Rate by 2025 (All Waste)-Introduced in the Zero Waste Plan (2010) and reiterated in "Making Things Last" (2016), this target aims for 70% of all waste (household, commercial, and industrial) to be recycled by 2025. The Overall Scottish household recycling rate is 43.5% and as outlined previously the Comhairle has achieved a 35% recycling rate and although this can be slightly improved the household spread, costs, logistics and geography of the islands will limit any significant increase to this without external intervention or significant costs that outweigh any benefits.

5% Landfill Limit by 2025 - Also from the Zero Waste Plan, this target limits all waste sent to landfill to no more than 5% by 2025. This was still sitting at around 31% in 2021 for Scotland however the increase in energy from waste plants will make this a more achievable target for mainland local authorities. The Comhairle are still landfilling about 65% of all waste (including commercial and industrial waste) however this will drop, albeit at significant cost, if BMW is shipped to mainland facilities. The only way the Comhairle could realistically achieve this target is to stop landfilling altogether.

MAJOR RENEWABLE DEVELOPMENTS

The islands, particularly Lewis, will be subject to major developments from the renewable sector over the next five years which will have a significant impact on the islands. It is expected that, at peak, there will be 1,500 workers in addition to peak visitor numbers which will add to the volume of municipal waste the Comhairle has to collect and dispose of. It is unknown what demand any commercial and Industrial waste will have on landfill capacity although there is greater scope for the sector to find its own mainland disposal routes given the volume of material that will be coming on island.

SUMMARY OF ACTIONS

Objective	Actions
Comply with the BMW ban	Have disposal options in place by 1 January 2026
Improve the collection and reporting of waste data information.	Review and improve the way waste data is collected, recorded and shared to better inform collection and disposal options.
Increase household recycling rate aiming for an aspirational 70% by 2030.	Enhance engagement and education with residents to raise awareness and increase checks on collected waste.
Promote a circular economy by supporting reuse and waste prevention in island communities.	Enhance engagement and education with residents and businesses. Consider reuse areas at all HWRCs
Utilising any Extended Producer Responsibility payment offsets to improve recycling services and infrastructure.	Have tangible improvements that can be attributed to EPR payment offsets
Prepare for the 2027 Deposit Return Scheme (DRS) to increase container recycling rates.	Review kerbside collection and bring-sites waste types to see if recycling rates can be increased for material not covered by the DRS.
Comply with Scotland's net-zero goals	Monitor and compare the carbon footprint, energy source and usage for collection and disposal options for island waste to direct choice (whilst also considering cost).
Ensure affordability by balancing compliance with financial sustainability.	Have detailed financial metrics for collection and disposal options to demonstrate best value.

The actions outlined in Scotland's Circular Economy And Waste Route Map to 2030 are also outlined below and will results in further actions for the Comhairle over the period.

Strategic Aim	Actions (Priority Actions in Bold , further actions in normal font)
1:Reduce and reuse Responsible consumption, production and reuse	<ul style="list-style-type: none"> • Publish a Product Stewardship Plan to set out how we will tackle the environmental impact of priority products by 2025/26 • Develop further measures to tackle consumption of problematic single-use items and promote uptake of reusable alternatives (including consideration of environmental charging), prioritising action on single-use drinks cups • Develop measures to address the disposal of unsold consumer goods • Develop measures to improve the reuse experience for consumers • Deliver behaviour change-based approaches focussed on sustainable consumption, aligned to Let's Do Net Zero communications • Identify ways to expand business models that prolong product lifespan • Investigate further steps to promote business-business reuse platforms
1:Reduce and reuse Reduce food waste	<ul style="list-style-type: none"> • Develop an intervention plan to guide long-term work on household food waste reduction behaviour change by 2026/27 • Develop with stakeholders effective options to implement mandatory reporting for food waste and surplus by businesses from 2025/26 • Strengthen data and evidence • Review the rural exemption for food waste recycling, as part of recycling co-design process • Deliver enhanced support for businesses
1:Reduce and reuse Embed circular construction practices	<ul style="list-style-type: none"> • Support the development of a model for regional Scottish hubs and networks for the reuse of construction materials and assets from 2025-2027 • Develop new and promote existing best practice standards in circular practices within the construction sector, and assess the options for both voluntary and mandatory compliance • Investigate and promote options to incentivise and build capacity for the refurbishment of buildings • Investigate and promote ways to reduce soil and stones disturbance, movement and volumes going to landfill • Review opportunities to accelerate adoption of climate change and circular economy focussed purchasing in construction • Consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices

Strategic Aim	• Actions (Priority Actions in Bold , further actions in normal font)
2: Modernise recycling Household recycling	<ul style="list-style-type: none"> • Facilitate a co-design process for high quality, high performing household recycling and reuse services, 2024 – 2026 • Introduce a statutory Code of Practice for household waste services • Introduce statutory recycling and reuse local performance targets for household waste services (from 2030) • Undertake a consultation to explore kerbside collection of textiles • Strengthen the Householder’s duty of care obligation in relation to household waste • Give local authorities more tools to support household recycling and reduce contamination • Undertake a review of waste and recycling service charging • Review the monitoring and reporting framework for local authority waste services • Develop options and consult on the introduction of end destination public reporting of household recycling collected
2: Modernise recycling Commercial recycling	<ul style="list-style-type: none"> • Review of compliance with commercial recycling requirements, 2026 • Co-design measures to improve commercial waste service provisions, commencing by 2030 • Conduct a national compositional study of waste from commercial premises
3: De-carbonise disposal	<ul style="list-style-type: none"> • Develop a Residual Waste Plan to 2045, 2027 • Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector, 2027 • Support the inclusion of energy from waste in the UK Emissions Trading Scheme (ETS), and investigate other fiscal measures to incentivise low carbon disposal • Review and target materials currently landfilled to identify and drive alternative management routes • Facilitate the co-production of guidelines for effective community engagement • Increase the capture of landfill gas
4: Strengthen the circular economy	<ul style="list-style-type: none"> • Develop a circular economy strategy every five years, first one in 2026 • Set new circular economy targets by 2027 • Review and refresh Scotland’s Waste Data Strategy’s action plan • Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities • Develop public procurement opportunities to reduce the environmental impact of public spending, including scoping new legislative circular economy requirements for contracting authorities under section 82 and 82A of the Climate Change (Scotland) Act 2009 • Support greater uptake of green skills, training, and development opportunities