



# BEFS CONSULTATION RESPONSE: DRAFT CIRCULAR ECONOMY STRATEGY

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's existing built environment.

This is a response from BEFS to selected questions in the Scottish Government's 2025/26 consultation on its [Draft Circular Economy Strategy](#), which sets out a framework for developing a more sustainable economic model in Scotland in the period to 2045.

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

- [Climate Change Plan Scrutiny \(Sep 2025\)](#)
- [Petition to Safeguard Scottish Listed Buildings at Risk of Unnecessary Demolition \(June 2025\)](#)
- [Strategic Guidance on Climate Change Duties for Public Bodies \(May 2025\)](#)
- [Protecting Built Heritage \(Feb 2025\)](#)
- [Scotland's Circular Economy and Waste Route Map to 2030 \(March 2024\)](#)
- [Delivering Net Zero for Scotland's Buildings - Heat in Buildings Bill \(March 2024\)](#)

## 1: To what extent do you agree with the vision and outcomes for the strategy?

Agree. BEFS has been consulting with its Members and stakeholders towards the production of a [2026 Manifesto: Building Foundations for a Better Scotland](#). The Manifesto, which is designed to inform elections to the Scottish Parliament in May 2026, features a dedicated 'circular economy' section and linked policy recommendations. However, while agreeing with the general thrust, BEFS has reservations and open questions about some elements of the vision and outcomes, as described in our responses to questions two and three.

BEFS agrees that a meaningful transition to a circular economy requires a holistic strategy and cross-portfolio working from the public sector, in addition to supportive action from other economic actors including businesses, charities, community groups, and households.

BEFS Members have a particular focus on two key outcomes: better maintenance, retention, and reuse of our existing buildings; and mechanisms that promote circularity of building materials.

The embodied carbon present in the Scottish historic and existing built environment is immense. A [2020 Building Research Establishment report](#) notes 52.9% of Scottish housing was built pre-1946. The comparator figure for the UK is 38%, and 22% in the European Union.

This disparity demonstrates the scale of climate and socio-economic outcomes that could be derived from expanding maintenance, appropriate retrofit and circular construction practices in Scotland. The appropriate reuse of materials to repair and maintain Scotland's existing and historic building stock, as part of a fabric-first approach, is fundamental.

The vision and outcomes in the Draft Circular Economy Strategy are generally supportive of the context identified in BEFS Manifesto consultations, and the need to act with regard to protecting and reusing built environment assets and changing construction systems.

## **2: Do you have any comments on the vision?**

BEFS would welcome clarity on the several elements of the vision, which is notably short and lacking in depth. BEFS would like to understand, for example, what the Scottish Government's definition of a "nature positive nation" is.

BEFS notes the vision is for a "thriving economy... based on circular economy principles" and not for a "thriving circular economy". This appears to undermine the Draft Plan introduction, which states circularity must be fully embedded within the Scottish economy, and not simply tacked on. The vision could usefully be made consistent with the introduction in its language and presentation on this point; this consistency would support confidence in delivery and implementation.

The vision states that the public sector will have access to, "the skills and knowledge to benefit from opportunities arising from a circular economy". Local government officers in the [Conservation Officers Group](#) facilitated by BEFS regularly report major concerns about the limited staff capacity, skills training and funding available to them to deliver their current responsibilities, and the new unfunded duties that are regularly imposed upon them in national policy.

The vision and the remainder of the Draft Plan do not appear to recognise this problem in restricted local government capacity. Without acknowledging the problem, or setting out a delivery plan to address it, the Draft Plan will not be able to meet the vision, given the changes required in local government resourcing to implement it.

## **3: Do you have any comments on the outcomes?**

BEFS strongly welcomes commitments on the following outcomes:

*Maximising value from use of materials* - BEFS Members are particularly keen to see the Scottish Government investigate the international experience with Material Passport schemes, and consider adopting a suitable model in Scotland. Viewing circularity on a macro scale, BEFS has long advocated for the importance of the continued use and re-use of existing and historic buildings.

*Resilient supply chains* - Transition to local production of materials, including built environment materials such as slate, sandstone and timber, will help local economies in Scotland to withstand global supply chain disruptions.

*Business development of circular economy innovations* - This can be enhanced and quickened by skills training investments, and a hub and spoke regional skills centre model to ensure training and development opportunities are available to businesses throughout Scotland.

*Circular behaviours are the norm; People and communities engage in and benefit from circular activities* - BEFS Members readily acknowledge that a wider culture shift is needed across society to embed circularity. They also argue that the support infrastructure, systems and learning pathways need to be in place for people to engage with them effectively. This involves appropriate funding and practical action to support local circular economies in alignment with a Just Transition for Climate Change and Community Wealth Building principles.

**4: To what extent do you agree with the policy mechanisms identified?**

BEFS agrees with the plan to utilise multiple mechanisms, including place-based approaches, skills and education, procurement and systems thinking, to deliver the Draft Plan.

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

BEFS welcomes the prominence of policy alignment and systems thinking in this section of the Draft Plan.

BEFS Members fully recognise the importance and benefits of developing a circular economy, and are keenly aware that significant progress will require a great depth of cross-sector action and activity across the five themes identified in the 2026 BEFS Manifesto over multiple terms of the Scottish Parliament.

The five BEFS Manifesto themes are:

- Culture and Heritage;
- Net Zero and the Climate Emergency;
- Repair, Maintenance and Retrofit;
- Training and Skills;
- Planning and Place-making.

Utilising the stated policy mechanisms, which cover all of these themes, will be valuable in mainstreaming circular economic thinking across the economy and built environment.

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

BEFS welcomes the identification of the built environment as a priority sector, alongside energy, textiles, transport and food. BEFS will be keen to engage with the Scottish Government in developing and promoting actions in this sector.

BEFS Member Royal Institution of Chartered Surveyors have produced a [Whole Life Carbon Assessment Tool](#) for the built environment, which could provide a more concrete approach to the measurement of embodied carbon.

The UK Parliament's Environmental Audit Committee's 2025 report on [Environmental Sustainability and Housing Growth](#) includes specific recommendations on embodied carbon measurement, that could further enhance practical delivery of the draft Strategy's stated intention for formal measurement.

**8a: Do you have any comments on the plans and priorities for the built environment?**

BEFS is in general agreement with the three priorities to work with the sector to develop a roadmap, to promote adoption of lifecycle assessments for buildings, and to increase reuse of construction materials. The plans and priorities are, however, light on the detail of application and delivery.

BEFS would argue that the general aspiration to increase reuse of construction materials could be greatly strengthened by a formal commitment to investigate the international experience with Material Passport schemes, and to consider adopting a suitable model in Scotland. This is one of the policy recommendations in the 2026 BEFS Manifesto for the Built Environment.

BEFS is in active dialogue with Zero Waste Scotland and shares enthusiasm for the Scottish Circular Construction Hub it is leading on the development of. The reference to the Hub in the Draft Plan is helpful as it is likely to provide a wealth of learning outcomes and practical support for the built environment sector across Scotland. It may also be possible to accrue transferable learning from the other Hubs planned in Europe.

**8b: Do you have any comments on the plans and priorities for the Net Zero Energy Infrastructure?**

BEFS welcomes the focus on retrofitting and reusing built environment assets to maximise value, reducing unnecessary creation of new buildings, whilst recognising that some new-build will be required. Improving outcomes on productive reuse of vacant buildings is crucial, and is a key ask in the 2026 BEFS Manifesto.

One concern BEFS has with regard to retrofitting buildings for energy efficiency, is the potential for overlooking or downplaying existing conditions. The BEFS Manifesto argues that regular maintenance, repair and wider focus on improving the fabric of homes, so they are more able to transition to clean heat, is needed as a vital first step within a retrofit hierarchy.

Within linked legislation, it will be important that maintenance, repair and “fabric first” approaches receive appropriate attention. Without a windproof and watertight building, any interventions may be detrimental to both the building and occupant health. Without this starting point, actions will not result in the energy reductions expected, failing to improve building performance, negatively impacting on occupant health, and failing to meet fuel poverty aims.

BEFS Members and partners feel despite good polity intentions on retrofit, it is not happening quickly enough in practice, and at the quality and scale required. A practical response to this situation is under active consideration by the Retrofit Roundtable, a group of key built environment sector stakeholders including BEFS and the Chartered Institute of Building.

Through regular meetings and Parliamentary gatherings, the Retrofit Roundtable investigate and promote solutions to the retrofit challenge emerging from the sector. The [2024 Meeting Scotland's Retrofit Challenge report](#) highlighted the urgent need for stepping up action on retrofit to meet fuel poverty, building maintenance and Net Zero commitments and targets. The Draft Circular Economy Plan will similarly benefit from a renewed focus on retrofit project delivery.

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

This section could benefit from a reference to construction materials, although BEFS appreciates the highlighted Zero Waste Scotland research will include this.

### **10a: Do you have any comments in relation to the indicators proposed for outcome “The economic value derived from material use is maximised without increasing our environmental impacts”?**

BEFS would like to see preventative spend feature in these considerations. This is both in the form of money - investing in built environment maintenance, retrofit and reuse now to avoid requiring more expensive works further into the future - and in carbon - taking action now to reduce carbon emissions later.

In a restricted public finances context, the added value of investing now to set the foundations for lower costs in the longer term, holds even more weight.

### **10d: Do you have any comments in relation to the indicators proposed for outcome “Non-renewable resource extraction is minimised and renewable resource use is sustainable”?**

BEFS Members are cognisant that there is some trade-off here, as the historic and existing built environment requires non-renewable materials, such as the aforementioned slate, sandstone and timber, to ensure these buildings and public spaces remain in use.

There are, however, important carbon benefits available in sourcing these non-renewable materials as locally as possible, utilising the lessons from traditional construction practices for long-term advantage.

When balanced against considerations around the extremely high carbon costs of demolition and new-build, and the positive impacts for places, health and wellbeing, economic development and tourism in continued use of historic buildings, BEFS Members are in strong agreement that this use of non-renewable resources is minimal, and is a positive contributor of sustainable circular economies.

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*BEFS responses to a number of consultations in relation to the Built Environment can be found at: <https://www.befs.org.uk/resources/consultations/>*

#### **RESPONDENT INFORMATION**

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? YES

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. I CONSENT

Date of submission: 13 January 2026