

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No yes / no

The timescales for implementation appear appropriate, although the first review might be better left until 2016 to allow time for any new strategies to be introduced and to have effect. However, whilst we would like to see GES achieved by 2020, we are concerned that the huge amount of plastic litter already in our seas, which continues to degrade into ever smaller particles entering the food chain, is at such an advanced level that this may not be achievable (depending on the monitoring results).

Vision

Q2. Do you agree with this vision?

Yes No

Q3. Does the draft vision have the right level of ambition? If not, please offer alternative text or suggestions.

The 5 Strategic Directions summarise the breadth of approach and links to land strategies and we are in broad agreement with all five strategies and the aspiration to integrate with mainland policies.

However, in common with Keep Scotland Beautiful, we feel that the addition of the word "coastal" into the vision statement is required, which would clearly indicate the two areas that impact significantly on marine wildlife and ecosystems. Coastal litter above the high water level requires the same monitoring.

Continued monitoring of micro plastics as indicated in SD4 is welcomed and the development of achievable targets in decreasing these would indicate the right level of ambition.

There is an implication that the litter from land-based sources is not covered by the marine litter strategy however the promotion of land-based behavioural change (reduce, re-use, recycle) will impact on Coastal litter too. It is important to keep monitoring volunteer data gathered at beach clearances to help assess these changes.

Clearly defined links to all the current legislation (land and sea) are required and any simplification measures would be welcome.

Marine Strategy Framework Directive

**Q4. Do you think implementation to achieve Good Environmental Status under Descriptor 10 will be sufficient?
or do you think additional action in Scotland is also necessary?**

Yes No

Hopefully, over time assuming sufficient resources are directed at removing existing litter from the oceans as well as reducing new litter at source. Given the most recent news on the decline of Scottish (and indeed world-wide) bird populations, continued awareness-raising and measurement of all causes of mortality due to litter, whether entanglement, degraded plastic or bio contaminants is essential.

We welcome the use of OSPAR's Eco Quality Objectives which will provide a set of clear environmental indicators stating clear aspirations for a healthy North Sea as part of the ecosystem approach.

Strategic Directions

Q5. Do you agree that Strategic Directions are a suitable way of outlining action under the Strategy?

Yes No

Q6. Do you agree with the list of Strategic Directions?

Yes No We would call for robust implementation and regular and competent, consistent monitoring.

If not, how would you reword them or what would you add?

Strategic direction 1:
The specific addition of "Industry awareness raising and behavioural change" is also required.

Strategic direction 2 : Reference should be included to on-going work in Europe (The Clean Europe network)

Strategic direction 3: Agreed

Strategic direction 4: Agreed

Strategic direction 5 : Agreed

Actions

Strategic Direction 1:

Q7. What are your views on the possible actions?

Q8. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?

Q9. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?

Q7, The proposed actions could be strengthened by adopting a “Zero Tolerance” approach in conjunction with the Zero Waste strategy, including potential fines. A comprehensive landward litter-awareness programme is required as a preventative measure, as well as promoting use of less damaging materials in the common litter types, SRD etc. More focus is required on regularly removing litter at tidal “litter drop” locations and other hot spots to avoid it just being spread further round the coast. The Moray Firth Partnership is working with local communities to help identify such locations.

Q8 Having worked locally for over 15 years to try to reduce litter by focusing on education from a young age and public campaigns, we feel that moves toward a Zero Tolerance approach may also be required – stick as well as carrot. More waste / packaging / plastic bag reduction initiatives such as those adopted by “Transition Towns” should be also considered for wider adoption, although manufacturers may require legislation to be introduced in order to change their products / try to reduce unnecessary packaging.

Q9. These actions can be delivered as part of the existing campaigns however it is unlikely there will be significant change without additional resources and direction, in conjunction with a Zero Tolerance policy. Follow-through and action planning at local level will continue to be led by local strategies such as the Marine Litter Strategy for the Firth of Clyde and the Beach Guardians marine litter strategic reduction work done by the Moray Firth Partnership. It will be important to ensure a consistent high standard of approach across Scotland reflecting national strategies in a locally tailored way. More focus on clean-ups and national pride of place would be appropriate in conjunction with Highland Homecoming year activities.

Allocating some extra local resources in conjunction with a nationwide awareness campaign would help increase impetus of current local actions.

Encouraging closer co-operation between government and the third sector can yield positive and effective change. This is an opportunity for Marine Scotland through a vigorous nationwide, high-profile campaign to add significantly to local measures.

Strategic Direction 2:

Q10. What are your views on the possible actions?

Q11. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?

Q12. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?

Q13. Do you think any of the existing actions need to be improved? If so, please provide details.

Q10 We agree with both proposed the actions, as long as incorporation of the litter reduction strategy into the local marine plan did not just add an additional layer to the existing multiple legislation. . (With adequate resources and capacity to deliver)

Q11 A national, Zero Tolerance strategy is required. Also, although potentially costly to achieve, an extension of KIMO Fishing for Litter to remove more plastic litter when it is of a size that can be detected would be of immense value in reducing future problems of bio-accumulation. We feel there should be more public recognition of the work already done by fishermen to reduce litter through KIMO. Providing some financial support for this litter- fishing work would also help diversify activities for some local boats and support coastal communities.

Q12 The introduction of a whistle-blowing hotline for other vessels and for crew on-board ships to report inappropriate waste-disposal could be extended to land based businesses and be part of a wider overall campaign.

Q13 As stated above, enhanced use of on-the-spot-fines for litter dropping, fly tipping etc should be introduced as part of a Zero Waste campaign, in conjunction with the enhanced measures proposed to influence positive (non-littering) behaviour.

Strategic Direction 3:

Q14. What are your views on the possible actions?

Q15. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?

Q16. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?

Q17. Do you think any of the existing actions need to be improved? If so, please provide details.

Q14 Both actions are appropriate and necessary.

Q15. Additional measures should be considered to encourage manufacturers to use types of materials that would facilitate recycling and make correct disposal easier for consumers. Recycling collected marine litter is already promoted and facilitated through current litter collection and awareness schemes (MCS BeachWatch etc), and through improved port waste management facilities etc. Any other possible actions to turn marine waste into a resource are to be commended.

Q16 Other actions required :- increase policing and enforcement of current legislation. Local Authorities, the Crown Estate and private coastal landowners may need additional encouragement and public support to meet existing obligations to reduce litter.

Q17: see above.

Strategic Direction 4:

Q18. What are your views on the possible actions?

Q19. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?

Q20. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?

Q21. Do you think any of the existing actions need to be improved? If so, please provide details.

Q18. The actions proposed would certainly add weight to existing initiatives.

Q19. We see as key the action to "Prioritise an initial evaluation on the current state of research to give a scientific and technical basis for monitoring, knowledge gaps and priority areas for research ". Providing a baseline data across Scotland will be essential for comparative performance management, but such data must be read in conjunction with tidal and other data to show the actions of the sea in creating particular litter drop areas. Showing some seabed areas with low accumulations of litter can lead to local complacency, since in reality the litter may emanate from one area but be dumped in another. We need a national picture, rather than focusing too closely on local data for some measures.

Q20 Delivery of the proposed actions will require additional measures over and above under existing actions.

Q21. Further opportunities to monitor the status of the seabed could be taken during industrial dredging, laying sub sea pipelines and other work,, as well as through Research vessels. (Could this be a condition of granting a licence?) Additional monitoring of plastic particles in water around waste water treatment plants could also be undertaken on a periodic basis,

particularly in key areas such as the Marine SACs and proposed Marine Protected Areas.

Strategic Direction 5:

Q22. What are your views on the possible actions?

Q23. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?

Q24. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?

Q25. Do you think any of the existing actions need to be improved? If so, please provide details.

Q22: We support the suggestion that Marine Scotland should head up a national steering group on marine litter, leading by example, sharing best practice and prioritising actions, which will also inform their actions at an EU and global level. However, giving more support and weight to the work of the MCS should also be considered, given their significant input and data resources.

Q23 All of the actions are important as part of an overall campaign.

Q24. Given resources, more could be done under existing strategies, but a more tailored national level campaign, in conjunction with actions to reduce unnecessary plastic packaging, zero waste should bring benefits.

Q25 Not sure of perceived effectiveness of current measures.

Option for delivery

Q26. Do you think that Option 4 is the most appropriate mechanism for developing and improving policies under the Marine Litter Strategy?

Yes No *Combination of Option 3 & 4*

Any other views on the options outlined or other options not identified are also invited.

We agree that a networked approach would be the most useful giving maximum opportunity for dissemination of information and opportunities for co-production, however we feel that if the strategy is to have impact then the *“funding of select high profile initiatives that have a direct impact on reducing litter from source, and encouraging a waste as resource ethic”* from option 3 is also likely to be required, at least for the initial phase,

perhaps for review in 2015/16.

The ability of third sector organisations to respond to additional demands for local support is sorely stretched, and additional resourcing would make this cross-sector participation more productive.

Equalities

Q27. Are there any equalities issues that should be factored into the Equalities Impact Assessment for the Marine Litter Strategy?

Yes No

Strategic Environmental Assessment

Q28. Do you have any feedback on the findings of the Strategic Environmental Assessment?

Yes No

Partial Business and Regulatory Impact Assessment (BRIA)

Q29. Are there any particular issues that you wish to highlight with regard to the partial BRIA, and the potential impacts on the third sector, business and the economy?

Yes No

There is a high risk that the third sector would not be able to play its expected role if option 4 was adopted without any additional resources being made available, particularly for existing local initiatives to help in the delivery of the strategy.

General

Q30. Are there other issues that have not been highlighted in this consultation that you would like to mention?

Yes No