

# **Draft Scottish Marine Litter Strategy**

## **Analysis of Consultation Responses**

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# 1 EXECUTIVE SUMMARY

## Introduction

Marine litter poses a number of problems across the economy, environment and society. These detrimental effects include ingestion and entanglement of wildlife as well as wider ecosystem deterioration, public health issues and impacts on aesthetics and a wider range of economic impacts across those industries reliant on our coastal and marine environment.

On 3 July 2013 the Marine Directorate of the Scottish Government launched a public consultation to gather views on proposals for inclusion within a draft Scottish Marine Litter Strategy. The public consultation was open until 27 September 2013.

The consultation document outlined a series of actions to tackle the problem of marine litter. The Strategy sets out to tackle the increasing problem of marine litter and to meet international commitments under the Marine Strategy Framework Directive.

The Scottish Government's consultation paper set out 30 questions relating to Structure; Vision; Strategic Directions and actions; Option for delivery; further questions on the Equalities Impact Assessment; Strategic Environmental Assessment; Partial Business and Regulatory Impact Assessment; and a final question asking for further views.

The Scottish Government consultation response form set out all of the questions. The consultation document contained both closed and open questions. A number of organisations or groups also developed their own abridged versions of the consultation form. All responses received, in whatever format, were analysed with an overall aim of identifying key issues and ensuring that the full range of views was represented.

A total of 98 responses to the consultation document were received. These written responses have provided a range and depth of views on the draft Marine Litter Strategy which will help to shape the development of the final Strategy.

This report sets out the findings of the consultation responses that were submitted to the Scottish Government. The main aim of the analysis was to identify the key themes, as well as the full range of issues, raised by respondents in their comments on each question. The findings of the analysis are presented here on a question-by-question basis, in the sections which follow.

## Key Findings

A summary of respondent views on the draft Marine Litter Strategy follows:

- A total of 98 consultation responses were received, individual respondents formed the largest grouping (73%). In general, there was agreement with the principles contained within the Draft Strategy.

- The majority of respondents highlighted the need to ensure linkages between the Marine and National Litter Strategies in tackling the issue.
- A few respondents indicated that they would like to see the Strategy have more of a focus on marine based sources of litter.
- A few respondents expressed a view that action should be taken to address litter currently in the marine environment, including microplastics.
- Broad agreement with timescales for implementation of the Strategy and alignment with the Marine Strategy Framework Directive, however, some respondents suggested that the first review date should be aligned with that of the National Litter Strategy.
- For those respondents that offered a view on the proposed Vision for the Strategy, the majority suggested an alternative form of wording or further clarity.
- Opinion was split on whether action to tackle marine litter under the Marine Strategy Framework Directive would be sufficient. Half of respondents expressed a view that the Strategy, combined with implementation under Descriptor 10 would be largely sufficient.
- There was agreement on the approach to outlining action under the Strategy, however, the majority of respondents requested clarity or revisions to proposed Strategic Directions or the inclusion of additional ones.
- The majority of responses highlighted concerns about a perceived misrepresentation of 'Existing Actions' listed under Strategic Directions 2 and 3 within the consultation document. The Scottish Government acknowledges that further consideration and review of existing actions will be necessary.
- Around three-quarters of respondents opted for Option 3 as the delivery mechanism for the Strategy, a relatively high cost model and centralised approach, while the majority of organisations indicated agreement with Option 4, as the preferred delivery mechanism for the Strategy.

## 2 CONSULTATION RESPONSES AND APPROACH TO ANALYSIS

### Written responses

The Scottish Government set up a dedicated webpage to provide information about the consultation, including the consultation document and the standard response form containing all 30 questions. Respondents could submit their responses directly through the response form on this webpage.

Respondents were also invited to submit their responses by email or by post to the Scottish Government's Marine Planning and Policy Division.

All of the published responses to this consultation can be viewed on the Scottish Government website at:

<http://www.scotland.gov.uk/Publications/2013/11/5529/downloads>

### Response rate

A total of 98 written responses were received in response to the consultation document. Individuals comprised the largest single respondent group, submitting 73% of all responses received.

The number of respondents by respondent group are summarised in Table 1 below.

Respondent Group	Number of responses
Public sector	3
Local Authority or Local Authority Representative Body	5
Environment / Conservation	2
Individuals	72
Energy	1
Tourism and Recreation	1
Fisheries	1
Aquaculture	1
Local Group	5
Other	7

Table 1 – Respondents

Not all respondents gave answers to every question.

### Approach to analysis

The responses received included 72 which were submitted by individual members of the public and 26 by bodies or organisations. The majority of those individual responses were examples of campaign responses, very similar responses were submitted. Each have been treated as a separate response for the purposes of the analysis.

The majority of respondents were from Scottish organisations and individuals (60%), although many were received from people and organisations based in other parts of the UK or out with the UK.

Three quarters of responses were submitted using the Respondent Information Form (RIF) which is specified by the Scottish Government and the remaining responses were submitted as free text. The comments submitted by all respondents have been taken into account, with non-RIF comments that were not clear regarding which question they were intended to address being assigned to the most relevant consultation question.

The Scottish Government has entered all of the response data from each response received into a database. A qualitative analysis of comments provided by respondents was undertaken, with key themes encapsulated in the analysis.

### 3 ANALYSIS OF RESPONSES TO THE CONSULTATION QUESTIONS

The consultation document sets out 30 questions for respondents to consider in relation to the proposals outlined in the draft Marine Litter Strategy.

This section presents an analysis of respondents' comments in relation to Questions 1 - 26 in the consultation document. A number of questions have been taken together where they fall within the same policy topic.

#### Question 1 – Structure

##### Do you agree with the timescales outlined?

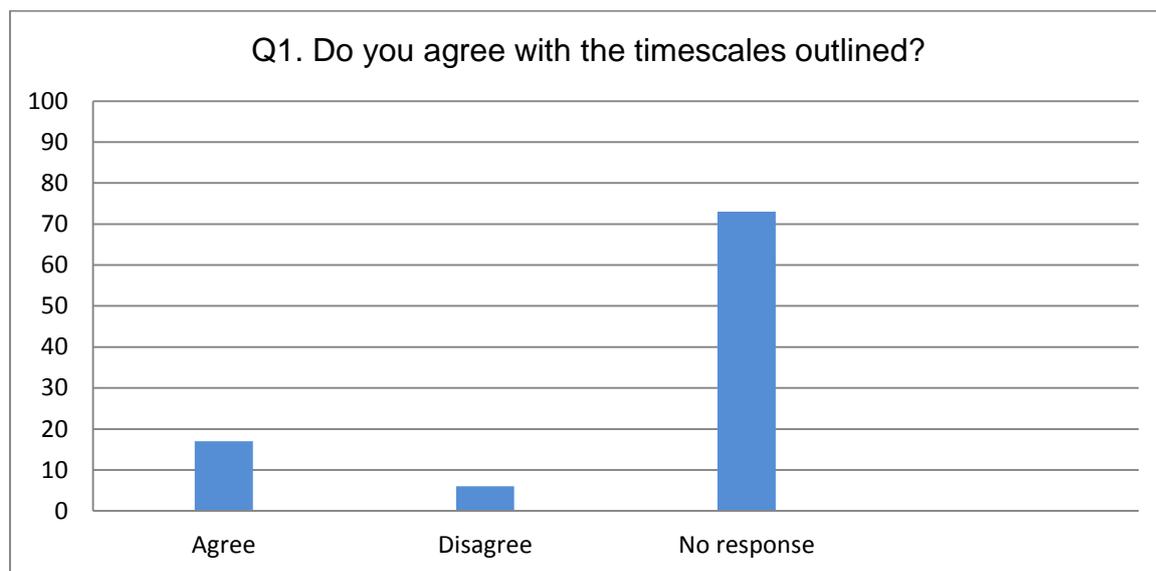


Figure 1 – Distribution of responses to Question 1

Question 1 was answered by 23 respondents and 17 indicated that they agreed it was appropriate for the timescales for the Strategy to be aligned with implementation of the Marine Strategy Framework Directive. However, six of those respondents suggested that it would be beneficial if the timing of reviews for the Marine and National Litter Strategies could be aligned to ensure consistency, with half of those respondents clear that this action should not delay implementation. A view was also expressed that a revised review date of 2016 would allow time for the Strategy to be introduced and have effect.

One respondent suggested that there may be opportunities now for piloting some initiatives in advance of the final strategy being adopted.

Six respondents indicated that they disagreed with the proposed timescales. Of those respondents, three emphasised that 2020 should not be seen as the end point. Instead the Strategy should be implemented as soon as possible and updated regularly to ensure it is relevant and effective, and reflect evidence based information under the Marine Strategy Framework Directive. Indeed, one respondent highlighted that they would have welcomed further information on the scope of the review process and sought clarification on what will be achieved within the proposed timeframe.

One respondent expressed concern about timescales that are linked to the National Litter Strategy, which do not necessarily fit with those of the Marine Strategy Framework Directive. Other responses stressed that faster progress on the Strategy is required to respond to the increasing problem of marine litter. This was reflected further by one respondent who expressed a view that the Scottish target should be more ambitious, and in line with the document 'UK Marine Strategy Part One'<sup>1</sup>.

Conversely, two respondents expressed the view that the timescale was optimistic, in particular, establishing a monitoring programme under Marine Strategy Framework Directive.

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<sup>1</sup> <http://www.defra.gov.uk/publications/files/pb13860-marine-strategy-part1-20121220.pdf>

## Question 2 – 4 Vision

**Q2. Do you agree with this vision?**

**Q3. Does the draft vision have the right level of ambition?**

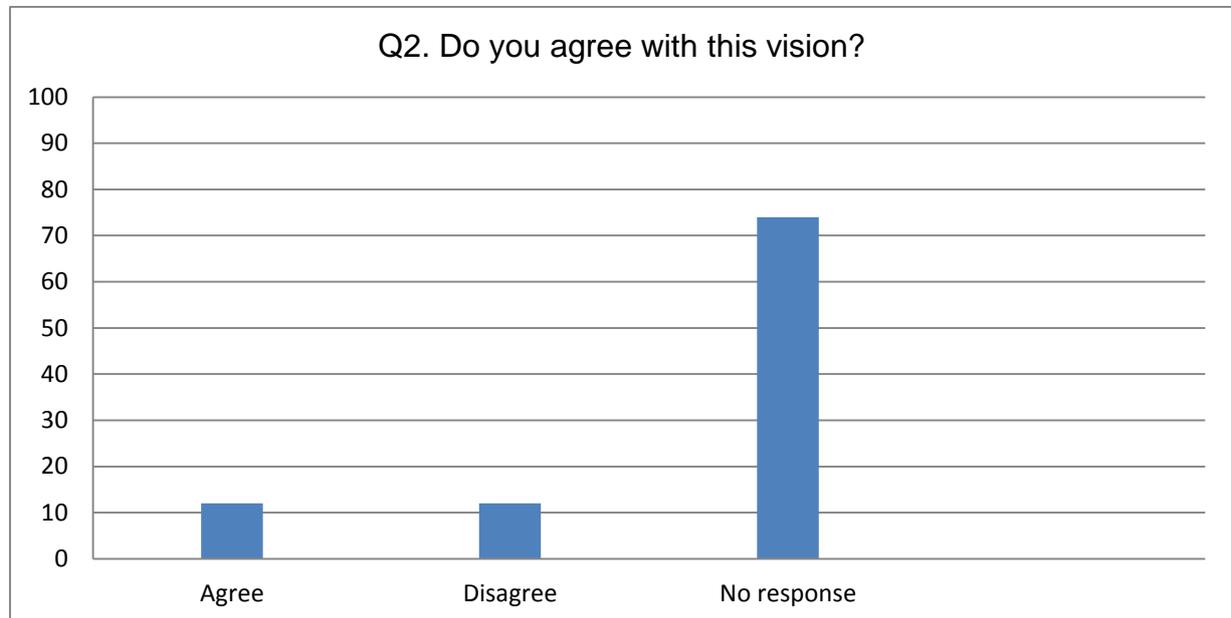


Figure 2 – Distribution of responses to Question 2

Questions 2 and 3 were answered by 24 people. Of those that responded, 50% were broadly content with the draft vision and level of ambition, although a number of respondents suggested additional text which could be incorporated to strengthen the vision.

Half of respondents to these questions felt that the vision was too vague in its ambition, and some respondents offered an alternative form of wording for the vision.

Two respondents felt that the Vision was not measurable and baselines should, therefore, be established.

Five respondents indicated that the Vision should go further than the targets set for Good Environmental Status. In particular, two respondents suggested that the Vision might include a target of an overall reduction of litter which may not be visible, and requested that this be investigated as part of the review process.

Overall, six respondents sought clarity on the definition of the term 'significant risk' in the vision. Respondents felt that it was not clear how progress against this target could be measured. One respondent suggested that 'significant risk' should be replaced with 'harm'.

There were a number of suggestions to changes to the Vision from small numbers of respondents:

- The addition of words 'coastal', 'litter' and 'redesign' to read "By 2020 marine and *coastal* litter ... and *redesign*, reduce, reuse, recycle and recover waste and *litter* resources".
- A further two respondents felt that the Vision should explicitly include coastal as well as marine litter.
- One respondent felt that the focus on waste should be broadened to include wider and related issue of behavioural change.
- Two respondents suggested that there should be a reference to existing legislation and the role of enforcement in reducing litter.
- Two respondents suggested that the Strategy should build on current work to manage marine litter removal by supporting volunteer groups, beach managing authorities and by ensuring enforcement policies are consistent.
- One respondent thought that the Vision should include a reference the key Strategic Directions and also sources of litter.
- One respondent suggested an alternative "By 2020 marine litter in Scotland is significantly reduced so that the integrity and function of marine ecosystems is not compromised and there is no significant risk to communities and human health. This is ...".
- One respondent suggested that the establishment of recycling plants would fulfil the vision of recovering waste resources.
- One respondent suggested that the word 'act' should be replaced with 'manage waste'.

One respondent suggested that the Vision could be strengthened by including text which emphasises the treating of waste as a resource.

While a few respondents expressed a view that tackling litter at source is key, others expressed concern that the focus of the Strategy was on prevention of litter at source and thought that the vision should also seek to include a target of an overall reduction of litter, particularly for those items of litter which may not be visible, such as microplastics. In addition, one respondent made reference to abandoned fishing and industrial materials in the marine environment and suggested that free recycling schemes should be established to target these types of litter.

A few respondents highlighted the importance of linking the Strategy to the Litter Strategy in addressing litter from land based sources.

**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 necessary?**

Question 4 was answered by 22 respondents. This question has two parts. There was a mix of responses with 45% (one individual; and nine organisations with a mix of Environmental and Local Groups, Local Authority organisations and Others, including the third sector) expressing a view that action in Scotland should go further than current Good Environmental Status targets for Descriptor 10:

Two respondents stated that there needs to be action to address the non-visible litter items in the marine environment, including the coastline.

Three respondents highlighted that there is an opportunity to set percentage targets, specifically in relation to OSPAR's<sup>2</sup> ecological quality objective where the baseline is known.

One respondent felt that additional action should be taken if there was to be a noticeable effect on marine litter levels and costs associated with tackling litter.

One respondent suggested that additional action required should include the promotion of regular beach cleans and marine litter surveys, as well as preventative measures.

One respondent felt that while a lack of data was an issue, that more ambitious targets should be set but acknowledged that this would likely require additional resources.

One respondent highlighted that there should be additional action because of the importance of the marine environment on industry and tourism.

Of those respondents that felt the strategy, combined with implementation under Descriptor 10 would be largely sufficient, a range of comments were received:

One respondent suggested that there may be benefit in undertaking a review of all current marine litter initiatives to gain an understanding of any resource gaps.

One respondent stated that a pragmatic approach would be to aim to meet Good Environmental Status targets rather than unrealistic goal setting beyond these targets.

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<sup>2</sup> Oslo & Paris OSPAR Commission for the Protection of the Marine Environment of the North-East Atlantic

Three responses highlighted the need for a standardised method of monitoring to be developed and implemented, with one highlighting that this was required to enable the development of longer term targets. Two of those respondents suggested that consideration could be given to the development of effective litter indicators such as categories/types of litter. Further to this point, one respondent expressed a view that in the absence of a baseline it was difficult to ascertain whether additional action or targets would be required.

One respondent stated that while action under Good Environmental Status will be sufficient now, there may be changes required as research develops. It was also suggested that the findings of the Marine Strategy Framework Directive Task Group 10 report (2010) should be considered. A further respondent highlighted the need for the Good Environmental Status targets to be robust and supported by an adequate programme of measures.

One respondent highlighted the key issues as being source control measures, linkage with the National Litter Strategy and ensuring that measures apply consistently to all sectors.

## Question 5 – 6 Strategic Directions

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

Question 5 was answered by 21 people (27%). All respondents who answered agreed that Strategic Directions are a suitable way of outlining action under the Marine Litter Strategy.

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

Two-thirds (67%) of those respondents who indicated that they agreed with Question 5, stated that they did not agree with the list of Strategic Directions outlined in the consultation document.

Although four respondents suggested broad agreement with the Strategic Directions, the majority (90%) of overall respondents offered suggestions for improvement in the scope, and changes to wording to strengthen Strategic Directions. The key issues raised were as follows:

#### Strategic Direction 1

- One respondent suggested that it needs to involve campaigns that are focussed on particular sectors.
- Four respondents highlighted that it needs to reflect business and industry attitudes and behaviour too.
- One respondent suggested adding the word 'coastal' to give sense of responsibility for both industry and the public.
- One respondent indicated that 'educational facilities' should be included to encompass marine litter in the curriculum.
- One respondent suggested removal of word 'marine' - 'Improve public and business awareness of, and behaviour changes, around litter'.

#### Strategic Direction 2

- Three respondents felt that this Strategic Direction should also include marine based sources of litter and a commitment to reducing existing litter in the marine environment.
- Three respondents suggested that there should be a reference to work on-going in Europe (The Clean Europe Network).
- One respondent suggested that this Direction should either be reworded to include land and sea based sources and activities, or alternatively a two-tiered Strategic Direction which addresses the issue of land sourced and sea sourced litter.
- Two respondents highlighted that reference should be made to Sewage Related Debris, as outlined in the Scottish Water case study within the Marine Litter Strategy consultation document. One of those respondents felt that in terms of sewage related debris being reduced, it was essential that the issue of inappropriate disposal of household items and industrial waste was tackled within both Litter Strategies.

- One respondent suggested that this Strategic Direction needs to be able to reflect geographic and industry differences, and potential pathways of litter.
- One respondent suggested that the wording of the Strategic Direction should be simplified to read 'Reduction of land based sources of litter reaching the marine environment, working in parallel with the National Litter Strategy'.

### Strategic Direction 3

- One respondent commented that actions under this Strategic Direction need to be more specifically linked to, and focussed on marine litter.

### Strategic Direction 4

- Three respondents called for a standardised classification method and reporting mechanism to evaluate the incidence and impact for the various categories of marine litter.
- One respondent sought clarity on what specific action and aims under this Strategic Direction might include e.g. beach or seabed surveys.
- Two respondents felt that improved monitoring could be achieved by ensuring that data is collated in a consistent manner across Scotland. Both respondents made reference to the Environment Protection Act 1990, and associated Code of Practice which they felt should be considered for the monitoring of coastal litter.

### Strategic Direction 5

- One respondent highlighted that this Strategic Direction needs to consider local action.
- One respondent stated the importance of ensuring that links already in place are supported and stakeholder engagement is maximised.

More general comments stressed the need for flexibility in the Strategy with regular reviews of the Strategic Directions and associated actions necessary. Indeed respondents highlighted that monitoring success of the Strategy should be an essential element. Many respondents said that the Strategic Directions should have more of a focus on marine-based sources of litter as well as land sourced litter, with a focus on integrated management across a trans-boundary issue. It was also suggested that the Strategic Directions should give a greater emphasis to supporting the development of local and regional coastal litter strategies.

The remainder of respondents suggested additional Strategic Directions as follows:

- Two respondents suggested that there should be a Strategic Direction which would support research into litter collection methods and an analysis of the impacts of cleaning; and the potential for removal of marine litter.

- Three respondents suggested that there should be an additional Strategic Direction around the improved use of and enforcement of existing legislation.
- Four respondents suggested an additional Strategic Direction to address the reduction of marine based sources of litter. Further to this, two of those respondents made reference to microplastics.
- One respondent suggested that there should be a new Strategic Direction to manage a programme to clean the coastline, providing local employment and utilising the existing network of organisations, volunteers and environmental groups.

Three respondents suggested that the link with the National Litter Strategy cannot be seen as the only way of delivering Strategic Directions 1 and 2, particularly if timescales for delivery are different.

## Question 7 – 9 Strategic Direction 1

- **Strategic Direction 1: Improve public and business awareness of, and behaviour changes around, marine litter**

**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?**

For the purposes of analysis, Questions 7 – 9 will be considered together based on the comments received to the consultation.

88 respondents commented on Strategic Direction 1. 66 (75%) responses gave a standard comment highlighting the importance of alignment between the Marine and National Litter Strategies.

- One respondent stated concerns about delivery of Strategic Direction 1 via the National Litter Strategy, in particular, the issue of whether opportunities to reduce litter and change behaviour can be achieved for the marine environment.
- One respondent highlighted that the National Litter Strategy must identify beach litter as a key issue.
- Two respondents indicated that they would welcome co-ordinated approaches with consistent messages across both litter Strategies.
- One respondent highlighted the issue of fixed penalties as broader move towards deterring littering and flytipping.
- One respondent suggested that the proposed actions could be strengthened by adopting a 'zero tolerance' approach in conjunction with the National Litter Strategy.
- One respondent suggested that 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.

In the remaining mixed responses, 3% of respondents indicated that the possible actions identified under Strategic Direction 1 did not go far enough while 16% were broadly supportive of the possible actions but offered comments or recommendations.

- There were views from three respondents that the work of community groups, volunteers and schools, and other initiatives such as Fishing for Litter, should be recognised and supported through the Strategy.
- One respondent suggested that the Strategic Direction should highlight that actions are aimed at land based sources and sea based sources and activities, that contribute to the marine litter problem.

In response to Question 7, and the specific possible action of education and awareness raising, there were a number of comments and suggestions:

- One respondent suggested that education should focus on visual impacts, with a focus on marine life, and the need to change the design of some products. It was suggested that Secondary schools, colleges and universities should be included in a litter education programme. It was also suggested that this should be extended to include Community Councils and Tenants & Residents Associations.
- The need for appropriate council cleaning services was highlighted, in relation to footfall, particularly in the vicinity of rivers and beaches.
- One respondent highlighted that it would be useful to identify good practice and any gaps in existing programmes and initiatives. It was also suggested that there may need to be a different focus in different areas to take account of the varying types of litter. On a similar theme, another respondent suggested that public campaigns may benefit by focussing on specific categories of litter, linking into existing initiatives. It was suggested that segmentation behavioural research would be helpful to inform actions.
- Two respondents suggested that the focus of education and raising awareness should be on the most prevalent items found on beaches, and consideration should be given to regional variations in the types of litter, and more research may be required.
- One respondent suggested that campaigns are useful tools, and another respondent highlighted that they must be on-going and focussed on tackling sources of litter.
- One respondent suggested that the actions should be aligned with 'information' strand of the National Litter Strategy, which could incorporate education on marine litter.
- Three respondents expressed a view that education and awareness needs to be extended to items such as microplastics and plastic pellets.
- One respondent stated that they would like to see commitment to include marine litter in the curriculum. It was also suggested that local approaches to education programmes should be incorporated into Strategic Direction 1.
- One respondent suggested that the focus of the education programme should include impacts of litter on marine species.

In response to the possible action to encourage producers to change the manufacturing design of products commonly found in the marine environment, there were a number of comments and suggestions:

- One respondent commented that if producers change the manufacturing specification of their products, they could also reinforce correct consumer behaviours in marketing campaigns.
- Two respondents suggested that influencing product design for key items found on beaches would be welcomed. It was also highlighted that while industry and manufacturers should be encouraged to change the design of products, it was essential for the public to be made aware of the impact of their actions.

- It was suggested by two respondents that in addition to engaging with manufacturers to reduce/redesign products, there could be penalties imposed on the use of the most harmful or prevalent items to encourage the development of alternatives.
- One respondent highlighted that there are examples of products which have been designed to avoid the marine litter problems e.g. degradable cotton bud sticks, but are not widely available in Scotland. It was suggested that increased uptake of these type of products may require intervention through industry voluntary agreement etc.
- One respondent commented that producers are only likely to respond if there is public pressure to do so.
- One respondent stated that there should be a ban on products that pollute the environment. It was also suggested that there should be a stricter approach to tackling littering and there should be more powers to raise on the spot fines by, for example, beach rangers.
- One respondent indicated that product development and labelling were of primary importance.
- One respondent suggested that more waste / packaging / plastic bag reduction initiatives should be also considered for wider adoption. It was noted that manufacturers may require legislation to be introduced in order to change their products or try to reduce unnecessary packaging.

In response to Question 8, three respondents highlighted the most important possible action is that of industry and producers changing manufacturing design of products and packaging, and one response emphasised that it was important for business and industry to lead the way on this. One respondent felt that education and awareness raising was the most important action.

Nine respondents provided comments on the importance of both possible actions identified in the consultation document. Of those, four respondents expressed a view that both actions were equally important and other responses noted the importance of the role of education and industry, and also facilitating behavioural change. Four respondents noted that a co-ordinated and coherent approach is needed to fully realise this Strategic Direction.

- One respondent commented that it would be useful to more fully understand barriers and facilitators for positive attitudinal and behavioural change that will lead towards a reduction in marine litter.
- One respondent commented that the initiatives could be complemented by enforcement activities.
- One respondent suggested that industry involvement is important but a variety of actions should be used and the solutions implemented are more likely to have a long term effect. The latter point was echoed in a further response.

Seven respondents specifically provided a response to Question 9 and expressed a range of views:

- One respondent commented that actions could be delivered under existing activities but not to the extent needed to achieve the Strategy's vision.
- Two respondents suggested that both possible actions could be delivered under existing activities but it would be unlikely that targets and indicators for Good Environmental Status under the Marine Strategy Framework Directive would be met.
- Two respondents suggested that some of the actions could be addressed by existing schemes which would have resource implications to be considered.
- One respondent suggested that current activities do not tackle all aspects of the marine litter issue and the Strategy should both help improve the effectiveness of current activities and be used to help develop new projects/ideas.
- One respondent suggested that while the actions can be delivered as part of the existing campaigns, it is unlikely there will be significant change without additional resources and direction.

## **Question 10 – 13 Strategic Direction 2**

- **Strategic Direction 2: Reduction of land-sourced marine litter entering the marine environment, in parallel to the National Litter Strategy**

**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?**

For the purposes of analysis, Questions 10 – 13 will be considered together based on the comments received to the consultation.

89 respondents commented on Strategic Direction 2. There was particular concern amongst 67 (75%) individuals who submitted a standard response and specifically expressed a view that the existing actions outlined in the consultation document under Strategic Direction 2 should be listed under 'Possible' actions. The existing actions referred to were as follows:

- Co-ordination with Zero Waste Scotland activity.
- Improve enforcement of ship waste management plans and inspections of Garbage Record Books under the Merchant Shipping (Prevention of Pollution by Garbage and Sewage) Regulations 2008.
- Incorporation of waste management systems into the design of new vessels.
- Extend existing Port Waste Reception Facilities to include fishing vessels.
- No-special-fee reception facilities and compulsory discharging of marine litter in port for all vessels including fishing boats.
- Research into recycling and reuse facilities for fishing nets at ports.
- An anonymous system to report vessels illegally dumping waste at sea.
- Incorporation of environmental responsibilities into the education and training of ship owners, ship operators, crews, port users, fishermen and recreational boat users.
- Plastics industry code of conduct for the safe handling, packaging and transportation, by sea of plastic pellets.

This view was reinforced by comments from a further 10 respondents (1 private individual and a mixture of organisations) who felt that many of the existing actions may not currently be happening to the level required or sufficiently enforced, or were in the very early stages of implementation. One of those respondents specifically requested that actions 2-9 be listed under the possible actions list, and considered for implementation.

Additional comments provided are summarised below:

- One respondent expressed a view that they did not believe the existing actions were being implemented sufficiently to achieve Strategic Direction 2, or the wider vision.
- Two respondents suggested that many of the existing actions are not currently happening.
- Two respondents suggested that the actions identified are not at an advanced stage.
- One respondent commented that there has been little or no positive action implemented on the ground.
- Two respondents suggested that the existing actions need to be strengthened, with more detail, to lead to a measurable reduction in marine litter.
- One respondent commented that these actions may not be happening at all ports across Scotland. It was suggested that a new action could be to assess the existing actions to identify how they are working; and what the geographic spread is of them.

In general comments about Strategic Direction 2, four responses felt that Strategic Direction should make provision for both land and sea based sources of marine litter, and stipulate land and marine sourced litter in its description. One respondent suggested that it may be appropriate to develop a 2-tiered Strategic Direction which addresses the issue of land sourced and sea sourced litter.

Two respondents requested more detail regarding specific actions which should be taken forward as part of the National Litter Strategy, and have a direct benefit on the incidence and amount of marine litter.

15 respondents commented on Question 11. 8 (53%) of respondents commented that both possible actions outlined in the consultation document were of equal importance. One response suggested that both actions would contribute equally to achieving the outcomes of the Marine Strategy Framework Directive.

Six respondents thought that the Fishing for Litter initiative should continue to be encouraged, and its expansion explored. It was suggested that it could contribute to education programmes, with one respondent suggesting that thought should be given as to how and by what means the message is delivered. It was also highlighted that the success of the initiative depends on the availability of facilities for the disposal of collected waste. One respondent thought that there should be more public recognition of work already achieved through the initiative to reduce litter.

Six respondents indicated that incorporating marine litter into regional plans was an important measure. Two of those responses highlighted that there would be a need to identify how performance will be measured and reported. A further respondent highlighted that regional planning must include a duty to reduce marine litter. Another respondent commented that it should not add an additional layer to existing legislation. Two respondents highlighted that the National Marine Plan should set

the framework for how marine litter reduction can be incorporated into regional marine plans.

One respondent commented specifically on Question 12 and indicated that the possible actions could be delivered under any existing schemes. However, it was suggested that some of the existing actions need to incorporate specific activities to address land sourced marine litter.

In responding to Question 13, two respondents felt that better enforcement was required to fully realise the actions. One respondent felt that the actions were ambitious given the international nature of shipping and its regulation. Three respondents suggested that existing actions could be improved by imposing deadlines. It was also highlighted that many of the actions rely on decisions made at the EU or international level and Scotland should look to implement best practice at the earliest opportunity.

A range of views were expressed and suggestions provided on other possible actions as follows:

- One respondent suggested that it may be appropriate to amend the associated actions for Marine Scotland, and the responsible sections of Scottish and UK government, to focus on contributing to national and international efforts to change vessel and training requirements. It was also suggested that action could be taken to review the requirements of the UK regulations on International food waste.
- One respondent suggested that consideration could also be given to looking at the opportunities for marine litter clean ups at sea in post-storm conditions.
- Two respondents expressed a view that where possible, duty bodies should identify and support opportunities for recycling and reuse of coastal and maritime sources of litter.
- One respondent commented that marine users such as fishing vessels, shellfish farms and other smaller commercial enterprises should be encouraged to have waste management plans. The respondent also highlighted an area of concern for marine operators on the issue of who is responsible for regulation of marine litter.
- Four respondents commented that the issue of Sewage Related Debris should be incorporated into the list of actions. Two of those respondents suggested the reintroduction of a public education campaign on this issue.
- One respondent suggested the development of a mariner course for those in the shipping, fishing and recreational sectors.
- One respondent suggested that co-operation with Scottish Water should be included as a potential action.
- One respondent suggested that mechanisms should be explored to ensure the return/recovery of prevalent items of marine litter e.g. fishing nets.
- One respondent suggested that a scheme to report inappropriate waste disposal could be extended to land based businesses.

### **Question 14 – 17 Strategic Direction 3**

- **Strategic Direction 3: Contribute to a low carbon economy by treated 'waste as a resource' and seizing the economic and environmental opportunities associated with the zero waste plan**

**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?**

For the purposes of analysis, Questions 14 – 17 will be considered together based on the comments received to the consultation.

88 respondents provided comments on Strategic Direction 3. There was particular concern amongst 66 (75%) individuals who submitted a standard response and specifically expressed a view that two of the existing actions outlined in the consultation document under Strategic Direction 3 should be listed under 'Possible' actions. The existing actions referred to were as follows:

- Encourage port and harbour reception facilities to drive separate collection.
- Deliver a project to establish free fishing net disposal at a network of fishing ports across Scotland, to include the infrastructure to recover and recycle the nets and other plastics recovered from fishing operations.

10 further respondents (one private individual and a mixture of organisations) expressed a similar view, and there was a general perception that it was unclear which existing actions outlined under Strategic Direction 3 were currently underway, and in which locations across Scotland. Five of those respondents specifically requested that the two existing actions highlighted be added to the possible actions list, and implemented. Additional comments provided are summarised below:

- Two respondents highlighted that the establishment of a free scheme for disposal of fishing nets at fishing ports would require to be adequately resourced.
- One respondent commented that if both actions, highlighted above, are indeed taking place they should be improved by enforcement, appropriate infrastructure and encouraging business and industry to develop a market for recycled materials.
- Four respondents suggested that an additional action of enforcement be added to the list of possible actions. It was also suggested that a review be undertaken on a perceived lack of enforcement of existing activities.
- One respondent highlighted that they would like to see many of the existing actions at a more advance stage.

- One respondent expressed a view that some of the existing actions are not at a stage where they can be considered a success or not, and efforts must be made to implement them and review their effectiveness.
- One respondent made commented that the actions need timescales as it is not clear if they have been implemented already, and also suggested changes to the wording of both actions – ‘To provide’ or ‘To make available’ should replace ‘Encourage’ under action point 2; and action point 3 should include ‘beach cleans’.

18 respondents offered substantive comments on the possible actions outlined in the consultation document. The majority were broadly supportive of both possible actions, however, the points that were noted in the responses included clarity on deliverables; actions to enforce and incentivise recycling; and engagement with industry and local authority waste plans. Five respondents stressed the need to ensure a joined up approach, and the importance of ensuring links with the Zero Waste Plan, regional marine plans and co-ordination with delivery bodies, including Zero Waste Scotland, Local Authorities, The Crown Estate and private landowners.

One respondent made a general comment that Strategic Direction 3 should be more specifically linked to land and marine based sources of litter and clarified to further explain how the actions would impact on the problem of marine litter.

In response to Question 14, 12 (67%) respondents indicated that both possible actions outlined in the consultation document are significant and will enable recycling and reuse of materials. One respondent commented that while both actions had merit, they can only be implemented fully if there are end-user manufacturers, and it is important to link to efforts to engage industry.

One respondent indicated that investing in technologies that facilitate recovery and monitoring was the most important possible action and highlighted that this would require new actions.

One respondent expressed a view that the recycle and reward pilot is the most important action, however, also believed that possible actions should be investigated to generate financial assistance for clean technologies.

One respondent mentioned that a consistent approach to waste collection for recycling would be beneficial, and thought that the Strategy should encourage more research into recycling schemes, particularly those being carried out in other countries.

One respondent stated that they would support a Recycle and Reward pilot if such an initiative would not place additional financial burdens on Local Authorities. Further to this, one respondent highlighted that this pilot would need further consideration and engagement with local authorities, as it may have a negative impact on local waste services.

In response to Question 15, one respondent stated that seeking opportunities to incentivise recycling and correct disposal was the most important potential action. One respondent stated that investment in new technologies and environmental monitoring is essential, and four respondents commented that Marine Scotland must take responsibility for the monitoring of industry and enforcement of legislation. One respondent commented that the action looking to incentivise correct disposal is likely to have more impact on the amount of marine litter generated locally.

In response to Question 16, one respondent commented that additional work was required on 'producing waste as a resource', and on schemes to recover and recycle fishing nets.

In addition, respondents offered suggestions for improvement; or issues that they felt should be addressed:

- One respondent suggested that the redesign of products should be included alongside looking for opportunities to incentivise recycling.
- Two respondents suggested that targets should be considered to ensure that existing actions are delivered.
- Two respondents suggested that there is a need for investment into research and development of recycling routes, and end markets have to be identified.
- One respondent mentioned marine sector requirements linked to other areas of environmental legislation, in particular reference was made to the Waste (Scotland) Regulations 2012.
- One respondent suggested that more advice is needed for beach clean volunteers regarding what marine litter can appropriately be recycled.
- One respondent emphasised the importance of addressing waste at source, and the need for consumer awareness of the negative impacts of incorrect disposal of non-biodegradable waste on networks that serve Waste Water Treatment Works.
- One respondent highlighted that a lot of marine based litter, which is recovered, is not suitable for recycling.
- One respondent suggested that additional measures should be considered to encourage manufacturers to use the types of materials that would facilitate recycling and make correct disposal easier for consumers.

## **Question 18 – 21 Strategic Direction 4**

- **Strategic Direction 4: Improvement of monitoring at a Scottish scale**

**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?**

For the purposes of analysis, Questions 18 – 21 will be considered together based on the comments received to the consultation.

25 respondents commented on this section and the responses were generally supportive in terms of the possible actions outlined in the consultation document. There was overall consensus that actions would require a co-ordinated and standardised approach. Some respondents did, however, highlight recommendations which included: determining a data baseline; aligning multi-organisation research to assess impacts of marine litter the need for co-ordinated monitoring methodology.

In response to Question 19, many respondents identified the first two options under possible actions in the consultation document as being most significant. Two respondents felt that improving monitoring should not delay implementation of other possible actions outlined.

Six respondents highlighted that establishing a baseline for coastal litter would be very important, both for informing the Marine Strategy Framework Directive and in measuring progress. It was suggested that detailed surveys be conducted at representative locations using standard protocols.

Four respondents considered that the alignment of current and future monitoring, methods and organisations was most important.

Three respondents expressed a view that each possible action identified is integral to support the Strategic Direction.

Three respondents expressed a view that a review of 'where we are at' as the most important action.

One respondent expressed a view that the development of a baseline survey and the development of a standardised monitoring approach should be expedited.

One response indicated the most important actions as being the alignment of non-governmental organisations, developing a baseline for coastal litter and standardised monitoring approaches.

One respondent thought more action will be required to define possible actions. A similar point was raised by a respondent who suggested that more action is required to fulfil proposed actions under the Strategy.

In response to Question 20, three responses suggested that delivery of the possible actions would be difficult to achieve under existing activities, and will require additional measures. Additionally, four respondents commented that while some actions could be carried out by existing organisations and schemes, this would depend on additional resources being available.

In response to Question 21, one respondent commented that they would like to see many of the existing actions at a more advanced stage. Two respondents suggested that more detailed investigation and review of the existing actions may be needed to ensure alignment with the possible actions. One respondent commented that existing actions need to be strengthened to provide the baseline data required for the Marine Strategy Framework Directive.

Many respondents agreed that there was a need to develop and agree a standardised method for monitoring and recording. Respondents offered suggestions for possible methods for monitoring and recording:

- Monitor the occurrence of specific indicators at regular time intervals rather than overall counts for every litter type.
- Impacts as well as amounts of litter items should be considered when selecting effective indicators.
- Attitudinal and behavioural indicators could be used to track improvements in awareness of and behaviour changes around marine litter.
- A central reporting system for the removal of particular categories of litter, particularly where it might present a hazard. It was also suggested that there may be scope for the use of citizen science in a monitoring programme.
- Two respondents suggested that certain beaches/coastal areas should be identified as reference beaches and local volunteer groups, and others encouraged to carry out quarterly surveys.
- One respondent stated a view that voluntary beach cleaning should continue, and linked to this, a workshop with all data providers and those collating data should be a priority. One respondent stated that support should be provided through incentives for volunteers. Another response suggested that more training of volunteers may be required to ensure a high and consistent standard of surveying, together with recognition that the surveys are very valuable.
- One respondent suggested that there needs to be a national coastal litter survey initiative that targets a range of beaches.
- One respondent commented that increased surveillance was required to enable the development of longer term targets. It was also suggested that the dissemination of monitoring results should continue beyond 2020.

- Two respondents thought that an integrated approach to the monitoring of activities undertaken by key delivery organisations should be co-ordinated by Marine Scotland.
- Two respondents suggested that an additional action could be the monitoring and recording of litter, in line with key legislation, as for land based sources, types and grades.
- One respondent highlighted that there was also a need for more research to establish baselines and that the co-operation of research providers and agencies, and knowledge exchange with the plastic industry, should be promoted.
- One respondent identified that Local Authorities need to be fully involved in the consideration of any monitoring system, and monitoring of the success of the Strategy should link to existing reporting systems in place.

In addition, respondents offered suggestions for improvement; or issues that they felt should be considered:

- Three respondents expressed a view that organisations and data must be aligned so that information is shared and research co-ordinated.
- A few responses referred to the importance of linking the Strategy with recommendations made by the Marine Strategy Framework Directive subgroup on litter.
- Four respondents commented that the Strategy should align with the recommendations from the Marine Strategy Framework Directive Technical subgroup on Descriptor 10 (Litter), to ensure consistent methodology.
- Four respondents highlighted that it needs to be recognised that there may be variances with monitoring between Europe and Scotland. One respondent identified that consideration will be needed as to which areas should be monitored as baseline data and resulting action will vary widely.
- One respondent suggested that the monitoring of microplastics could be improved, and another respondent felt that this particular issue should be addressed within the Strategy. One respondent highlighted that more research into microplastics was required.
- One respondent highlighted that the monitoring programme needs to be better integrated with other monitoring activities, and further developed to make better use of existing monitoring resources. The latter point was echoed by a further two respondents.
- One respondent suggested that the impact of coastal landfill sites needs to be evaluated.
- One respondent suggested that 'Determine' should replace 'Develop' as a more accurate description of action required to establish baseline conditions.
- One respondent suggested that additional monitoring of plastic particles in Waste Water Treatment plants could also be undertaken on a periodic basis, particularly in marine protected sites.

## Question 22 – 25 Strategic Direction 5

- **Strategic Direction 5: Stakeholder engagement at the UK, EU and international scales**

**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?**

21 respondents commented on Strategic Direction 5 and were generally supportive of the possible actions proposed in the consultation document.

Of those respondents that provided comments to Question 22. One respondent indicated that a combination of all possible actions was important and suggested they should be standalone actions because of their national/local level focus.

Key recommendations included the formation of a Steering Group led by Marine Scotland with an integrated delivery approach and defined roles to include the co-ordination of volunteer organisations. 57% of respondents specifically outlined support for a National Steering Group to be led by Marine Scotland.

One respondent suggested that a Steering Group must include clear and accountable roles, and objectives and indicators, in addition to Marine Strategy Framework Directive criteria. A further respondent suggested that a National Steering Group could be used to influence other actions under this Strategic Direction. One respondent stated that leadership by Marine Scotland will be important to convey messages regarding the safe and proper disposal or recovery of waste.

Six respondents highlighted that regional marine plans would have an important role in implementation of the Strategy. One respondent suggested that there must be close co-ordination, by Marine Scotland, to ensure consistent messaging across Scotland. Three respondents highlighted that regional marine plans would need to address litter already in the marine environment, including non-visible items.

In response to Question 24, one respondent felt that none of the possible actions could be delivered under existing activities and believed that a Marine Litter Strategy should include these actions. One respondent felt that the co-ordination role of a national steering group would require specific operational rules, resources and a constitution under the guide of the Strategy. One respondent indicated that actions could be provided by existing organisations, if there was sufficient resourcing. One respondent suggested that a more tailored national level campaign, in conjunction with actions to reduce plastic packaging, could bring benefits.

In responding to Question 25, two respondents noted their opinion that existing actions could be improved through more public engagement. One respondent indicated that the effectiveness of current measures was not clear.

Three respondents felt that more needs to be done to support enforcement of existing legislation. One of those responses suggested the addition of a new Strategic Direction to cover this issue.

Further work suggested by respondents to inform best practice included the following issues:

- Further research and development work, a joined-up international approach and incorporation of wider issues into the Marine Strategy Framework Directive.
- One respondent suggested that the role of volunteers needs to be better recognised. Further to this a respondent stated that there should be more support for the work of the Marine Conservation Society.
- Two respondents highlighted that local engagement is essential. One respondent suggested that local coastal partnerships should have a role in taking forward approaches suited for their areas.
- One respondent stated that resource sharing should not preclude from accessing new resources when they are clearly required.
- One respondent stated that a joined up approach at an international scale is appropriate, and to that end Scotland would further benefit from involvement with the Global Environmental Faculty who is leading the international response to marine debris.
- Two respondents suggested that the former Clean Coast Scotland Network chaired by Keep Scotland Beautiful could be resurrected to support the engagement of stakeholders.
- Two respondents suggested that an independent delegation could better represent Scotland at OSPAR.
- One respondent explicitly suggested the need for co-ordination among all stakeholders, at a Scottish or UK level, to ensure a standardised approach.
- Two respondents made a similar suggestion for a new action to create a Steering/Working Group that could share and prioritise good practice on implementing the Strategy.

## Question 26 – Options for Delivery

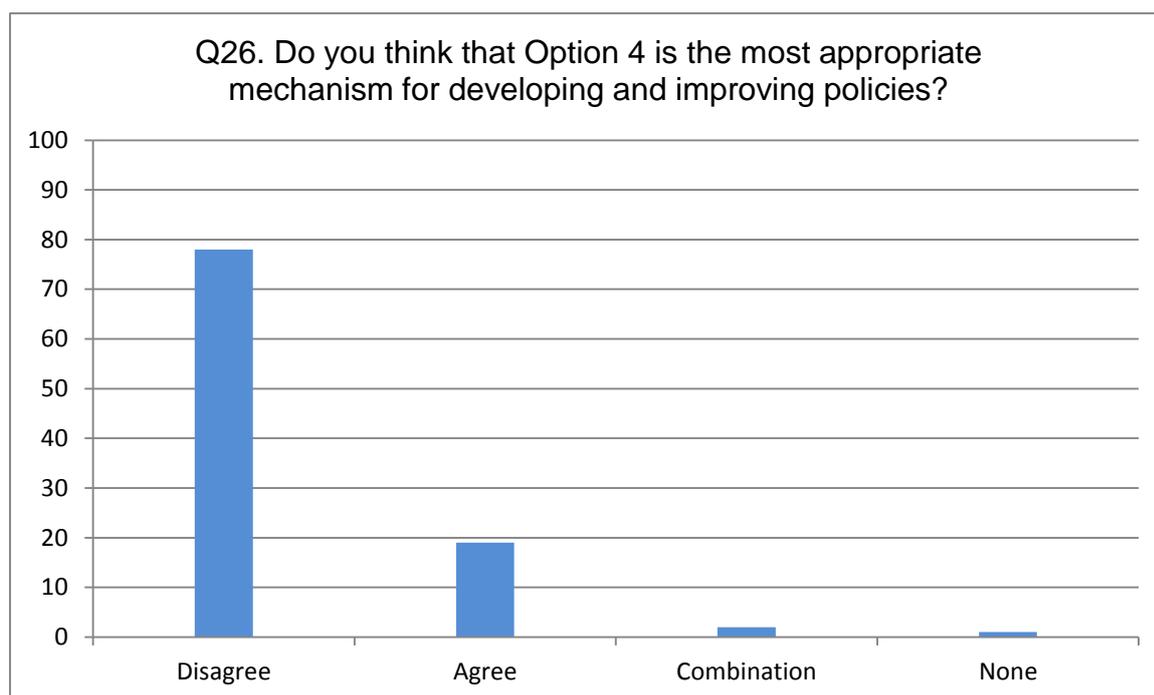


Figure 3 – Distribution of responses to Question 26

90 respondents commented on the question. 66 (73%) of those who submitted a standard response to Question 26 disagreed and stated a preference for Option 3. Those responses suggested that Option 3 should include the following:

- A lead authority identified;
- Funding for dedicated Policy Officer;
- Funding for high profile campaigns;
- Scotland wide co-ordinated campaigns; and
- Government led data collection strategy, to include baseline data.

Those other respondents (one environmental/conservation organisation, one 'other' organisation and two private individuals) who opted for Option 3 felt that it would allow the marine litter problem to be tackled more successfully, with appropriate funding and resources.

17 (19%) organisations agreed with Option 4, while no individuals stated a preference for this option. The responses from the 17 organisations indicated that Option 4 would be the most appropriate and balanced approach for delivery of the Strategy. Those organisations that said 'yes' to the question comprised four 'other' organisations, three local groups, three public sector organisations, three local authorities, one environmental/conservation organisation, and the fisheries, tourism and energy organisations. A common theme amongst those responses was the need for wide stakeholder and sector engagement, and more specifically, the Strategy should be adapted to local needs. Respondents suggested that Option 4 should include the following:

- Central co-ordination from marine Scotland and a dedicated Policy Officer in context of wider initiatives and international engagement.
- Initiatives that have a direct impact on reducing litter from source.
- Implementation plan, including objectives and performance measures.
- Monitoring plan both for levels of debris in the environment, and the Strategy itself.
- Funding from national, European and international sources.
- Utilise and promote work carried out by existing networks and stakeholders.
- Regular review of resources.
- Networked, regional approach in parallel to regional marine plans to develop and prioritise actions.

One environmental/conservation organisation and one private individual expressed a view that a combination of Option 4 and Option 3, with additional resourcing, would be most effective and prevent unnecessary duplication of effort while prioritising local issues.

One organisation stated that it was not possible to identify a preferred option from the analysis provided in the consultation document, which the respondent felt required further clarity, particularly on cost.

## **Question 27 – 29 Analysis of Responses to Equalities Impact Assessment, Strategic Environmental Assessment and Business and Regulatory Impact Assessment**

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

Question 27 was answered by three respondents who identified equalities issues, to be included as part of wider Strategy development, as follows:

- Unequal litter clearing operations in relation to levels of population;
- Equality of enforcement for all marine vessels;
- Potential challenge for rural areas in supporting recycling schemes.

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

Four organisations submitted comments on the Strategic Environmental Assessment. Three of those respondents suggested amendments or improvements to the Strategic Environmental Assessment. No private individuals commented on the document.

One respondent suggested a number of detailed amendments to the Strategic Environmental Assessment to reflect the impact of litter on the waste water treatment system, where it can lead to blockages and result in the release of sewage related debris.

Another response suggested that there is a need for more research and monitoring to establish baseline data for the Marine Strategy Framework Directive, as well as microplastics in the marine environment.

One respondent highlighted the linkages between terrestrial and marine litter and suggested that both the Marine and National Litter Strategies have similar levels and types of objectives; and that monitoring measures should be developed to evaluate the success of both Strategies in terms of the impact on changing behaviours and awareness raising.

### **Q29. Are there any particular issues that you wish to highlight with regard to the Partial Business and Regulatory Impact Assessment, and the potential impacts on the third sector, business and the economy?**

Question 29 was answered by eight respondents, three of those responses were from private individuals. The small number of comments received highlighted elements of the impact assessment as follows:

- The impacts of litter on tourism, inward investment and the impact on well-being and behaviours.
- Action to reduce the impact of marine litter will have a positive effect on national and local economies, including improvements to the tourism industry and marine recreation; the sea fishing sector; and a decrease in litter clean-up costs.

Three respondents, which included two private individuals, submitted similar responses which suggested that there would be a need for additional support for third sector organisations should Option 4 be the preferred approach for delivery of the Marine Litter Strategy.

One respondent highlighted continued work to reduce sewage related debris in terms of its impacts on the water and waste network.

### **Question 30 – Further comments**

Twenty-two respondents commented on the question and a number of issues were raised in response.

#### **Strategy and its implementation**

The Marine Litter Strategy was welcomed by some and many respondents offered suggestions for elements that could be improved or should be included.

It was suggested that the Strategy should include a review process and timetable to measure its effectiveness, stakeholder engagement and implementation of actions.

One respondent felt that the anti-litter message in general should be covered under the National Litter Strategy.

Respondents suggested that there should be detailed action to address microplastics and the clean-up of existing marine litter to ensure these issues are addressed.

A few responses mentioned the need for better education of the general public and industry about the problems and impact of marine litter, with particular reference to sewage related debris and waste from maritime activities.

It was highlighted that there was a need for more data on the extent and spread of offshore litter, including on the seabed.

A viable source of appropriate funding was felt to be important. A suggestion was the introduction of a tax mechanism e.g. tax imposed on the use of plastic bottles, to fund coastline monitoring and cleaning programmes.

#### **Stakeholders**

It was suggested that support of volunteers, and community initiatives should be given greater prominence within the Strategy.

#### **Actions**

The need for adequate bin infrastructure on beaches was mentioned by a couple of respondents. It was also suggested that beach cleaning activities be prioritised – based on type of beach and litter hotspots – so that resources can be allocated efficiently.

It was noted that proposed action to improve enforcement of existing measures, should align with future marine planning.

It was suggested that there is a need for a monitoring and recording service for marine and coastal litter, similar to the methodology used to monitor and grade Scotland's award beaches.

## **General**

Two respondents said that community groups had difficulties accessing Zero Waste Scotland funding available for anti-litter initiatives due to the organisation's interpretation of rules regarding state aid. It was requested that this restriction be reviewed.

Two local authority respondents raised an issue of landfill tax on marine litter removed from the sea. It was requested that the application of the landfill tax to the Fishing for Litter project, and related activities, should be reconsidered.

#### **4 NEXT STEPS**

The draft Scottish Marine Litter Strategy will be amended to take account of comments received to the consultation, along with any other available evidence.

It is anticipated that the Marine Litter Strategy will be published in summer 2014.



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