

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No

I agree that the timescales of the Marine Strategy Framework Directive (MSFD) and the strategy should be aligned, as long as there are no delays in implementation.

However, it must be noted that the timescales must also tie in with the Strategy to tackle and prevent litter and flytipping.

Both timescales quote 2020 for a visible difference to be made and this is to be welcomed. The Marine Litter Strategy also proposes a review in 2015, while the Strategy to tackle litter and prevent litter and flytipping suggests a review in 2017. It would be beneficial if both strategies were reviewed at the same time, and one does not hold the other up.

Vision

Q2. Do you agree with this vision?

Yes No

I agree with the vision in principle, but believes that the strategy should go further. While clean up activity is key to the removal of litter from coastal areas and beaches, the focus on reducing, reusing, recycling and recovering waste, should not be in isolation. There should be a clear link in the vision to the existing European, UK and Scottish legislation and the role that the enforcement of these legal documents plays in reducing marine and coastal litter.

However, it is widely understood that littering is less likely to occur in areas which are clean. Keep Scotland Beautiful's Clean Up Scotland campaign and the Marine Conservation Society's Beachwatch programme both show that significant numbers of people get involved clearing litter from our coastal environment indicating that community action and litter removal and surveying plays an important part as one of a suite of interventions.

Building on current successes to manage litter removal; by supporting volunteer groups; by empowering and rewarding beach managing authorities that regularly clean beaches and provide and service appropriate receptacles; and by ensuring enforcement policies are consistent across Scotland, will support the Marine Litter Strategy and the part that enforcement and service provision must not be undervalued.

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

The vision is ambitious; however it could go further than the standards set for Good Environmental Status by including an overall reduction of litter which may not be visible. I would welcome an indication that this could be investigated at a later stage, perhaps during the proposed review in 2015. It is noted that an existing action in SD4 is monitoring of micro-plastics and this would allow the development of a more ambitious vision in the future.

Inserting the word **coastal** into the first line of the proposed vision is also suggested. Including 'marine and coastal litter' clearly indicates the two areas litter can be left, and found, which impact the marine and coastal ecosystems. Both coastal and marine litter are referred to in the definition in the document summary.

This consultation suggests that litter from land based sources will not be tackled by the marine litter strategy, however it is important that litter on the coastal fringes (beaches / above high tide marks, are monitored as part of this picture as the two types are intrinsically linked).

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 *(No to the first part, Yes to the second)*

I believe that achieving Good Environmental Status will be sufficient. However, the targets set by DEFRA are no more than this, they are not aspirational. Scotland has the opportunity to set percentage targets, particularly with the OSPAR Ecological Quality objective where the baseline is known.

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 X

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

Strategic Direction 1 – Industry awareness and behaviour change also needs to be included.

Strategic Direction 2 – This should also include reference to work on-going in Europe (*The Clean Europe Network*) and further afield, as detailed in the document summary, litter which lands on our shores and seas can be sourced to areas outside our seas and from terrestrial sources in other countries.

Strategic Direction 3 – Agreed.

Strategic Direction 4 – Agreed, particularly with collating data, in addition to volunteer data, in a consistent and regular manner across the country. Linking litter monitoring on beaches to Part IV, Section 89 of the Environment Protection Act 1990 (EPA), and the associated Code of Practice on Litter and Refuse, could result in improved monitoring of coastal litter too.

Strategic Direction 5 – Stakeholder interaction at UK, EU and Global level is to be welcomed. As referred to in response to Strategic Direction 2, the links already in place should be supported and maximised.

Suggested additions to be considered:

The link with the National Litter Strategy cannot be seen as the only way of delivering Strategic Directions 1 & 2, particularly if the timescales are different, with implementation of the National Litter Strategy not due until 2015, when the review of the Marine Litter Strategy is proposed, and when monitoring of Good Environmental Status is due to be established in summer 2014. There is the possibility that these important strategic directions will not be implemented in line with the others, and that implementation may be put on hold.

As alluded to in the response to Strategic Direction 4, there are a number of key pieces of legislation in place in Scotland to help tackle marine and coastal litter issues. Better implementation, wider understanding, smarter delivery and enforcement of these laws would be beneficial and logical. (Particular reference should be paid to the EPA, and the Bathing Waters (Scotland) regulations 2008 where coastal and marine litter is specifically referred to with standards attributed).

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 possible actions are adequate, but the range required needs to be greater and more ambitious. Influencing product design, specifically for key items found on beaches, such as cotton bud sticks and sanitary items, and fishing line / nets / creels would be welcomed in particular.

Q8. Both actions are equally important. While industry and manufacturers must be encouraged / coerced to change design of products and packaging in order to reduce the number of disposable products available, it is essential that the public of Scotland are made aware of the impact of their actions, and advised of appropriate behaviour choices.

Q9. Both actions can be delivered under existing activities, but Keep Scotland Beautiful believes it is unlikely that the targets and indicators for GES will be met this way. Additional direction, resources, and a consistent Scotland wide approach is needed under the Marine Litter Strategy to ensure that a significant difference is made. Many of the regional models are excellent (eg. Marine Litter Strategy for the Firth of Clyde, The GRAB Trust Beach Litter Campaign, the Coastal Fora Beach Litter educational material, and Keep Scotland Beautiful's Clean Up Scotland campaign), and good practice is abundant, however it must be scaled up and replicated at a national level, and appropriate funding and resources provided in order for delivery to be achieved.

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.

Many of the existing actions listed are not currently happening. As such it is difficult to answer these questions. This issue was raised with the Scottish Government prior to this response being drafted.

However, in answer to Q10/12 it is thought that expanding the Fishing For Litter project would be beneficial, as would the development of mariner courses for those in the shipping, fishing and recreational sectors. Once again a ramped up and expanded initiative would require additional funding

and capacity to deliver.

One type of marine and coastal litter which the particular source can be specifically identified is Sewage Related Debris. I personally would like to see the reintroduction of a public education campaign, such as Bag it and Bin it, to be revamped and communicated to the public to reduce sewage related debris and encourage appropriate disposal. The action could be led by Scottish Water and key partners. The Clean Up Scotland campaign could assist with consistent and clear messaging spread via local authority, NGO, coastal partnership, school and community networks on prevalent items found during coastal and marine surveys. The Scottish Water case study suggests that hot spot areas will be identified to establish asset screen problems. However, stopping the predominant current behaviour, which has proved successful in past localised behavioural change campaigns, has not been presented as an action. I strongly believes that this should be included as a possible action.

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.

I am unsure which of the existing actions listed are currently underway and being delivered, and which are aspirational and still in the discussion phases and so should be listed under possible actions. As such it is difficult to answer these questions. This issue was raised with the Scottish Government, and clarification sought prior to this response being drafted.

Q14. Supporting and raising the importance of recycling and reusing materials where possible, and correctly disposing when not, is vital. Both actions would be welcomed, and investing in innovative technologies to recycle fishing net for example will help to ensure marine waste is seen as a resource.

Q15. Current legislation, marine and terrestrial, is not being policed and enforced as well as it could be. I'd like to see this added as an action to the strategy to ensure that investment in this area is realised, and can then be reviewed. Deadline targets should also be considered to ensure that

existing actions are delivered.

Q16. The Marine Litter Strategy needs a lead body to take responsibility for monitoring and legislation enforcement. It must link to the Government's Zero Waste Plan and to the delivery body Zero Waste Scotland, however, it is important that links to regional marine plans and to local authorities, the Crown Estate and private land owners with a remit for cleaning the shore are not ignored. Marine and coastal litter issues are not just about attaining zero waste and higher recycling targets, important as these may be. Levels of litter can impact tourism, the health of those living in coastal communities and has high financial consequences to all users of the marine and coastal environment.

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 Scottish Marine Litter Strategy must, as a minimum, link to the recommendations made by the Marine Strategy Framework Directive subgroup on litter. This will ensure consistent methodology, and should link through all possible actions. However, care must be taken to ensure that the EU methodology accounts for the specific nature of Scotland's vast and varied coastline and seas.

Q19. All possible actions have great merit; however improving monitoring should not delay implementation of other possible actions.

Q20. I think that the delivery of the proposed possible actions would be difficult to achieve under the existing activities outlined.

Q21. A further action, as referred to in the answer to Q6, would be to monitor and record litter in line with key legislation in Scotland, as for land based sources, types and grades. The EPA and associated Code of Practice on Litter and Refuse should be, until a time when this is reviewed, considered for monitoring, particularly for coastal litter. This is currently carried out on all 56 Seaside Award and three Blue Flag beaches on an annual basis, and reported on, however could, with adequate funding, be extended to capture all designated bathing waters, and a carefully selected number of Category Zone 5 beaches, as done and reported on for all other zones under the Local Environment Audit and Management System

(LEAMS).

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.

Q.22 A national steering group on marine litter should be set up and chaired by Marine Scotland. Sharing best practice and prioritising actions will need to be led by one lead authority – I believe this should be Marine Scotland.

I think that Keep Scotland Beautiful should be invited to sit on the national steering / stakeholder group to assist where possible with the delivery of the strategy.

Q23. All proposed actions are of importance, but the first two are of more relevance to the aim and vision of Keep Scotland Beautiful. It is felt that regional marine plans must include actions to reduce litter, but close co-ordination of this to ensure consistent messaging across Scotland must be led by Marine Scotland.

The former Clean Coast Scotland network, chaired by Keep Scotland Beautiful, and supported by many NGO's, Government Departments, Public Bodies and the Scottish Coastal Forum could be resurrected to support the engagement of stakeholders.

Q24. I strongly believe that while existing communications, sharing of best practice and resource sharing currently happens on a small scale, there is willingness for greater collaboration. In order for this to happen consistently across Scotland the Marine Litter Strategy must address all actions.

Q25. As stated in response to Q. 6 & 21, more should be done to support the delivery and use of the tools in our current legislative armoury. Seeking to support enforcement of both land based and marine based legislation in the UK, Europe and the Global context would be of great benefit.

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

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

I think that Option 4 is a tangible compromise, however in order to best deliver on the actions outlined in the marine litter strategy I believe that Option 3 would achieve far more.

Delivering the strategy using the resources that are already committed, as eluded to in Option 4, is not likely to allow the problem to be tackled and the aspirations of the strategy to be achieved. Regrouping activities that are on-going under a stakeholder / steering group will help, but won't radically change the situation or help Scotland meet GES.

I strongly believes that it is not possible for a national stakeholder group, consisting of members from charities and public bodies, to support a policy officer and lead authority without financial assistance and additional capacity creation. Real on the ground action will not be possible if key elements of the strategy have to be delivered by existing staff and resources in the sector.

Option 3 allows for a centralised policy unit, which will lead the strategic approach, and I believe this should be Marine Scotland, and resources for a dedicated policy officer, stakeholder engagement and the funding of select high profile initiatives. It is the appropriately funded partnership delivery of Scotland wide messages, consistent campaigning, reporting that will make a tangible difference to the future of Scotland's seas and coastline.

Equalities

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

Yes No

Comments

Strategic Environmental Assessment

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

Yes No

Comments

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

As Scotland's environmental charity, Keep Scotland Beautiful has a vested interest in seeing a reduction in marine and coastal litter, and welcomes the strategy. It is recognised that there are financial implications to the third sector if Option 4 is the preferred option.

General

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

Yes No

Comments