

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No

No comment.

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.

RYAS are pleased to note that the draft vision avoids the use of specific numerical targets as it is our view that this would be difficult to achieve and might have detracted from the wider benefits offered by this strategy. We do however seek clarity on the definition of 'significant risks' in this context. Floating debris such as bags and rope can become wrapped round a propeller or rudder or sucked into a cooling water intake and disable a vessel thus leading to risk of loss of a vessel and potentially of life.

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

Scotland has already taken important steps towards tackling litter and waste on a large scale (with the Zero Waste Plan, National Litter Strategy and now the Marine Litter Strategy) and it is the view of RYAS that these efforts, combined with the implementation planned under descriptor 10 will largely be sufficient. It may be beneficial to undertake a full review of all initiatives tackling marine litter across Scotland to gain an understanding of potential resource gaps that may need addressing. For example, in some places a significant proportion of marine litter comes from ropes, nets and creels lost overboard or from fish farms, particularly during adverse weather. Recognition of those sectors already seeking to tackle this issue, such as recreational boating through the RYA/BMF environmental initiative The Green Blue, may help to encourage improved action in those which are less

active in this field.

There seems to be some tension between the GES characteristics listed in section 1.23 and the corresponding targets and indicators. It is not necessarily the case that highly visible items of litter pose the greatest risk to the coastal and marine environment. Some items have an adverse aesthetic impact but do not affect wildlife. Indeed some items of litter can provide habitats or food sources for marine wildlife. An extreme case of this is where a vessel is sunk to provide an artificial reef.

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

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

It is not clear at this time how success would be monitored for all of these directions, in particular numbers one and five. Monitoring is an essential element of delivering a successful strategy and should be considered from an early stage. Strategic Direction 1 needs to involve campaigns that are tightly focussed on particular sectors identified as being of importance as sources of marine litter. Strategic Direction 5 also needs to consider local action. For example, the recent Pentland Firth and Orkney Waters Pilot Marine Spatial Plan consultation included a section on marine litter.

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?

A useful starting point would be to draw together the existing programmes that seek to achieve this objective and identify good practice and any gaps. The first action has been on-going in various forms for several years and the problem has not been resolved so perhaps something different may

precipitate change. Although data gathered from beach cleans shows an 80% terrestrial origin, few areas away from bathing beaches and sewage outfalls are currently sampled. There may need to be different focuses in different areas to take account of the spectrum of litter. Data from Orkney beach cleans, for example, show the predominant sources of marine litter there to be fishing, aquaculture and agriculture.

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.

All actions are important but the incorporation of environmental responsibilities into training programmes for members of all sectors generating significant amounts of litter is particularly important. The sectors listed should include aquaculture. Both possible actions look promising and would contribute equally to achieving the outcomes of MSFD. Incorporation of litter reduction into the Regional and National Marine Plans important. The feasibility of expanding the excellent Fishing for Litter initiative to other sectors should be explored but its success depends on the availability of facilities for the easy disposal of the collected wastes. Both the current draft National Marine Plan and the PFOW Pilot Marine Spatial Plan refer to the Marine Litter Strategy as something that will feed into these plans.

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.

All the existing actions are important. Consistency of approach to waste collection for recycling would be beneficial as recreational boaters often visit many different harbours and marinas in a cruise. The second possible action is interesting; much work has been carried out in Italy over recent years into the recycling of GRP boat hulls. If the Scottish Marine Litter Strategy encouraged more research of this nature then it would be beneficial for both the recreational boating and the leisure marine industry.

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.

The first two possible actions seem to be the most significant; the second, however, would be difficult to achieve. It is perhaps the most important from an MSFD perspective and would require the joined up thinking proposed in the first possible action to achieve. The most cost-effective means of developing a baseline and the subsequent time course of change would be to conduct detailed surveys at a few representative locations using standard protocols rather than attempting a complete geographical coverage. SNH has used indicators like this to look at the impacts of climate change.

Another action might be to encourage the central reporting of the removal of particular categories of litter, particularly where it represents a hazard. The RNLI, for example, may be able to identify cases where vessels have required rescue due to damage from marine litter. The Crown Estate has removed debris from the sea bottom that posed a risk to anchoring.

Finally, there is scope for the use of citizen science in a monitoring programme and to seek ideas for efficient, effective and low-cost monitoring from groups such as students of marine science.

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.

This item does not seem to be really about stakeholder engagement as commonly understood. Much of the existing work on reducing marine litter has been carried out by volunteers and their role needs to be better recognised. It is unclear that the expertise in marine litter resides within Marine Scotland, although Marine Scotland has a clear role in facilitating the work of a steering group to better coordinate actions by the various groups such as Keep Scotland Beautiful, the Marine Conservation Society, Local Coastal partnerships and Scottish Coastal Forum, community groups etc. Local involvement is essential with communities taking ownership of the problem and solutions. One option would be to allow the Local Coastal Partnerships to progress approaches best suited to their areas, within the context of the Scottish Strategy.

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.

Options 4 seems to be the most likely to produce the desired results although the funding of select high profile initiatives that have a direct impact on reducing litter from source from option 3 could also be effective, particularly where there are other benefits from taking this action. Not controlling litter also has a cost associated with it. It is important to consider not only sectors but also regions (possibly the Scottish Marine Regions). Depositing litter is an offence so enforcement agencies also need to be involved.

Equalities

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

Yes No

No comment.

Strategic Environmental Assessment

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

Yes No

No comment.

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

No comment.

General

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

Yes No

The strategy has naturally focussed on marine litter of terrestrial origin. However, although commercial vessels visiting Scottish ports seem to be complying with the merchant shipping regulations with regard to waste disposal it can take many decades for litter dumped at sea to reach the shore after being driven by global ocean currents. There is thus a need to continue collecting litter washed up on beaches and elsewhere on the shore even if terrestrial sources are stopped.

Strategic Direction 2 of the equivalent strategy for Northern Ireland refers to the removal of litter from the marine environment and makes strong reference to the role of volunteers in achieving this objective. Support of volunteers who clean beaches should be given a higher profile in the Scottish strategy.