

Thank you for the opportunity to be consulted on the Marine Litter strategy for Scotland. I am responding on behalf of the Northern Lighthouse Board the General lighthouse Authority for Scotland.

The NLB has no specific role in the management of litter or waste from ships however as a operator of two ships and a wider experience of the shipping industry we are aware of the issues surrounding marine litter. As an operator of lighthouses on many of Scotland's remotest and unspoilt shores we are all to aware of the impact of litter on the local environment and welcome this strategy.

I am limiting my comments to section 3.4 of the strategy. Of the possible actions expanding the fishing for litters seems a practical step which could have some results. Incorporating marine litter in regional plans seems sensible as it keeps a focus on the issue however what actual impact that would have on litter levels is debatable.

Of the existing actions a number are ambitious given the international nature of shipping and its regulation. It is questionable whether the limited resources of the MCA and animal health officials can increase inspection regimes of waste management, and that the IMO can be readily influenced beyond existing requirements to incorporate more waste management systems in to the design of new vessels or incorporate new training requirements for seafarers. It should be noted that the requirements of MARPOL which includes garbage are taught as part of all officers certificate of competency.

It may be better to change the associated actions for Marine Scotland and the responsible sections of Scottish and UK government to reflect this and focus on contributing to national and international efforts to change vessel and training requirements.

There is actions that can be taken that may aid better recycling and to review the requirements of the UK regs on International food waste regulations which require all materials from internationally trading vessels that may have contained or been in contact with foods onboard to be treated as class1 waste and therefore go to landfill or incinerated.

I hope you find this response useful. If I can be of any further help please do not hesitate to contact me

Kind regards

Phil

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