



# The Chartered Institution of Wastes Management

**Scottish Government:**

**Consultation on Draft Scottish Marine Litter Strategy**

**September 2013**

## **CIWM Scotland Centre – Response**

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 7,000 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management industry and has various grades of membership determined by education, qualification and experience.

The Scottish Centre Council of the Chartered Institution of Wastes Management welcomes the opportunity of contributing to the **Consultation on Draft Scottish Marine Litter Strategy September 2013. Please note that this response is in line with feedback from our Scottish members and head office technical team.**

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste management industry. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the management of all wastes.

# CONSULTATION QUESTIONS

## Structure

### **Q1. Do you agree with the timescales outlined?**

#### **A1. Agree**

It makes sense for the implementation of the Scottish Marine Litter Strategy to be aligned with the Marine Strategy Framework Directive (MSFD).

## Vision

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

#### **A2. Don't Agree**

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

**A3.** The first part of the vision is broad reaching and has the right level of ambition and aims to link marine litter with resource management and consumption overall which is positive. However additionally, we feel the vision should reference the key strategic directions and key sources of litter. The vision could also state that it includes the management and reduction of existing persistent marine litter both at sea and when it does reach the shore as well as the reduction strategy for future marine litter. It is important that all of Scotland's communities should achieve good clearance standards once material does reach the foreshore.

## 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?**

#### **A4. Yes**

A standardised method for monitoring needs to be developed to allow the targets and indicators to be used and compared effectively.

Is it worthwhile looking at whether an alternative to the overall reduction in the number of litter items within specific categories/types on coastlines could be used: for example the occurrence of relevant indicators for each of the primary sources of marine litter e.g. for SRD, Fishing, Recreational/Tourist litter rather than overall counts. These could then be used to indicate improvements over time. These could be used at specific selected sites that were representative of the types and range of marine litter found on the Scottish coastline e.g. the monitoring of specific indicators at marine litter collector sites, SRD Hot Spots, beaches used recreationally by the public etc. Effectively developing indicator species for litter by source

It may also be worthwhile including attitudinal and behavioural indicators that could be used to track improvements in public and businesses awareness of, and behaviour changes around marine litter. The impact as well as the amounts of items should be considered when selecting effective indicators.

## **Strategic Directions**

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

**A5.** Agree

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

**A6.** Don't Agree

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

Strategic Direction 2 This should include marine sourced litter as well as land sourced marine litter and a commitment to reduce existing marine litter (irrespective of source or type of litter; for example micro plastics i.e. smaller plastic particles, and the original plastic sources from which these arise)

Strategic Direction 3 needs to be more specifically linked and focused to marine litter.

Strategic Direction 4 Can this be broader to include: Standardised classification method and reporting mechanism to evaluate the incidence and impact for the various categories of marine litter in Scotland e.g. land borne; SRD Hotspots; fishing and shipping debris etc;

## **Actions**

### **Strategic Direction 1:**

**Q7. What are your views on the possible actions?**

**A7. For the public:**

These campaigns may benefit by focusing on specific categories of litter and could link into existing initiatives and working with experts in the target areas for example: Scottish Water running a campaign to reduce the amount of SRD flushed down toilets; or ZWS running a campaign to reduce the incidence of recreational litter; or MCS running a campaign to highlight the impact of micro plastics on the marine environment.

**For businesses:**

Campaigns could focus on the economic and environmental impact of marine litter from a business perspective (tourist industry, fishing, waste water industry etc;

It would also be useful to more fully understand the barriers and facilitators for positive attitudinal and behavioural change that will lead towards a reduction in marine litter: Segmentation behavioural research with the public and businesses directed by the key litter categories and sources (land and marine) would be helpful to inform the actions that could be undertaken as part of Strategic Direction 1.

Although re-designing materials such as alternative to cotton buds would help to reduce the impact of the amount of this type of plastic within the marine environment and the impact they have on the waste water treatment network and treatment facilities it will not change the behaviour of people in their disposal practices (if flushing), and as such may also encourage negative behaviour. If producers change manufacturing specification they also could reinforce the correct consumer behaviours in associated marketing campaigns.

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

**A8.** It would be useful to more fully understand the barriers and facilitators for positive attitudinal and behavioural change that will lead towards a reduction in marine litter: Segmentation behavioural research with the public and businesses directed by the key litter categories and sources (land and marine) would be helpful to inform the actions that could be undertaken as part of Strategic Direction 1.

**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?**

**A9.** An integrated delivery approach is required optimising, integrating and co-ordinating the activities of the key delivery organisations retaining and developing existing expertise and knowledge.

### **Strategic Direction 2:**

**Q10. What are your views on the possible actions?**

**A10.** Strategic Direction 2 specifies land sourced marine litter but many of the existing and possible actions listed focus on marine sourced litter; should strategic direction 2 stipulate land and marine sourced litter in its description.

The actions both existing and suggested are important for reducing marine litter overall. More detail is required re-specific actions that could be undertaken as part of the national litter strategy co-ordinated by Zero Waste Scotland which would directly benefit the incidence and amount of marine litter; and these specific actions should be listed.

Consideration could also be given to looking at the opportunities for marine litter clean ups at sea in post-storm conditions to collect surface litter before it reaches land. The £Fishing for Litter+type scheme run at KIMOø instigation is a worthwhile way of allowing/encouraging fishing boats which pick up littering/dumped material as a by-catch to their normal fish/shellfish take to be able to off-load at participating ports. This should continue to be encouraged. Additional clean-ups could coincide with current national campaigns, such as Beach Watch and the National Spring Clean.

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

**A11.** Incorporate marine litter reduction into regional marine plans under the Marine (Scotland) Act 2010.

**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?**

**A12.** Yes can be delivered under existing activities.

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

**A13.** See comments under Q10; some of the actions need to incorporate specific activities to address land sourced marine litter.

**Strategic Direction 3:**

**Q14. What are your views on the possible actions?**

**A14.** Generally Strategic Direction 3 and its possible actions could be more specifically linked and focused to marine litter (land and marine based sources) and clarified to explain what the potential impacts would specifically be on marine litter.

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

**A15.** See response to Q14.

**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?**

**A16.** See response to Q14.

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

**A17.** Please see general comment in Q14.

**Strategic Direction 4:**

**Q18. What are your views on the possible actions?**

**A18.** All clear and would benefit the improvement of monitoring at a Scottish scale.

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

**A19.** Each action is integral to support Strategic Direction 4.

**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?**

**A20.** An integrated delivery approach is required optimising, integrating and co-ordinating the monitoring activities of the key delivery organisations retaining and developing existing expertise and knowledge co-ordinated by Marine Scotland.

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

**A21.** Standardised methods for monitoring and recording would be beneficial. Is it worthwhile looking at whether an alternative to the overall reduction in the number of litter items within specific categories/types on coastlines could be used: for example developing source specific litter indicators for each main category of marine litter and then monitor the occurrence of these specific indicators at regular time intervals rather than the overall counts for every litter type. These could then be used to indicate improvements over time. These could also be used at specific selected sites that were representative of the types and range of marine litter found on the Scottish coastline e.g. the monitoring of specific indicators at marine litter collector sites, SRD Hot Spots, beaches used recreationally by the public etc.

It may also be worthwhile including attitudinal and behavioural indicators that could be used to track improvements in public and businesses awareness of, and behaviour changes around marine litter. The impact as well as the amounts of items should be considered when selecting effective indicators.

#### **Strategic Direction 5:**

**Q22. What are your views on the possible actions?**

**A22.** Agree with actions; is there an opportunity to do further research and development work to further inform best practice.

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

**A23.** National steering group on marine litter led by Marine Scotland is the most important action.

**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?**

**A24.** Yes with the integrated delivery approach co-ordinated by Marine Scotland.

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

**A25.** See responses to Q21.

#### **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?**

**A26. Yes**

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

Option 4 would be preferred from an affordability perspective. There is also a need for stakeholder engagement and for initiatives that have a direct impact on reducing litter from source and these should also be included as part of Option 4.

#### **Equalities**

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

**A27. No**

#### **Strategic Environmental Assessment**

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

**A28. No**

## **Partial Business and Regulatory Impact Assessment (BRIA)**

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

A29. Impacts of reduced marine littering to the national and local economies in Scotland include betterment of the tourism industry, both specialist (e.g. whale and dolphin watching, scuba diving, etc) and more generally from local amenity improvement. Fishing as a primary industry will possibly see increased yield and better quality and local authorities should find their clean-up costs fall in line with reduced litter incidence.

## **General**

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

A30. Yes

As an organisation drawing its membership from a wide variety of private, public and third sector organisations the CIWM would be pleased to contribute to the development of the Marine Litter Strategy.

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CIWM has welcomed this opportunity to comment on the **Consultation on Draft Scottish Marine Litter Strategy September 2013**

We would be pleased to have the opportunity to discuss the above and the various issues that will arise.

If you require further information on this response please contact:

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