

## CONSULTATION QUESTIONS

### **Structure**

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

Yes  No

Comments

### **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.**

The Firth of Clyde Forum welcomes the vision set out by the Scottish Government in the Draft Scottish Marine Litter Strategy. However we believe that the vision could be strengthened by adding in text which restates the Government's desire for waste to be seen and treated as an exploitable resource rather than rubbish to be sent to landfill.

### **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

The Clyde Forum is supportive of this timetable and aim to create a Regional Marine Litter Strategy to support the delivery of the National Strategy in due course.

### **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?**

The Forum is in broad agreement with the Strategic Directions as stated in the Marine Litter Strategy however we would like to see the Directions give greater emphasis to supporting the development of local and regional coastal litter strategies.

The Clyde Forum would also welcome an addition to the Strategic Directions which would support research into better litter collection methods and analysis of impacts of cleaning on strandline biodiversity and beach stability.

The Strategic Directions demonstrate an underlying integrated coastal zone management approach but the Clyde Forum would welcome a clearly stated focus on integrated management of this trans-boundary, terrestrial and maritime issue.

### **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?**

As discussed in the [Firth of Clyde Forum's Shoreline Cleaning Guidelines for Local Authorities](#), 2012, the public seem to find it easier to engage with processes which are homogeneous across topics and regions. With this in mind the Clyde Forum would recommend that Local Authorities are encouraged to develop a Coastal Litter Management Plan which can be used as one of a suite of tools, including Water Quality objectives and Health & Safety initiatives, to develop a comprehensive Beach Management Strategy.

There are many benefits for the duty body, the general public and local businesses as a result of developing and implementing an effective Coastal Litter Management Plan. These include:

- The assignment of reference beaches for data collection ensures that the effectiveness of initiatives to reduce marine litter inputs can be measured and allows for monitoring under the Marine Strategy Framework Directive Descriptor 10.
- Increased ownership of the issues by local people and involvement in beach cleaning initiatives helps to raise awareness of the issue and

ultimately reduce inputs of litter to the marine environment.

The following is a list of suggested contents for a Coastal Litter Management Plan. Obviously each coastal area has different features, levels of litter and community needs and therefore contents and format will vary.

- Introduction
- Marine litter background
- Objectives of the plan
- General map of area indicating shorelines and categories
- General description of coastline and uses
- Explanation of beach categories, cleanliness targets (see below)
- Summary of any agreed initiatives or actions such as bin types, signage, working with local retailers etc
- Support provided by the duty body for community/volunteer/Criminal Justice beach cleans
- Advice and initiatives on litter data gathering
- Individual beach description pages
- Staff rota by area
- Contact details as appropriate by area/department

Cleanliness grades have been identified in the Code of Practice on Litter and Refuse (Scotland) 2006, which accompanies Part IV (section 89) of the Environment Protection Act. These grades can be used to establish a target for cleanliness and how quickly an area should be returned to a Grade A level. Most people regard Grades C and D to be unacceptable. The overall aim should be to operate a management system where acceptable standards of cleanliness (Grades A and B) are maintained at all times.

#### 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.**

The Zero Waste Plan launched by the Scottish Government in 2010 contains a vision whereby all waste is viewed as a resource. With this in mind, wherever possible duty bodies should identify and support opportunities for recycling and reuse of coastal and maritime sources of

litter.

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.**

Comments

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.**

As discussed in the Clyde Forum's Guidelines (referenced above) there is a need to devise and/or agree a standard methodology for reporting on the amount of litter in the coastal zone. It would be helpful if the Marine Litter Strategy encouraged this approach. OSPAR has produced guidelines on monitoring litter in the OSPAR Maritime Area and these, or the Marine Conservation Society methodology could be a good starting point for a standard across Scotland.

The Forum would also recommend that certain beaches/coastal areas are identified within each Local Authority area as reference beaches and that local volunteer groups are encouraged to perform quarterly surveys on those beaches using the Marine Conservation Society's Beachwatch scheme or the OSPAR guidelines.

The Criminal Justice Social Work (CJSW) Services ensures that people

placed on community service orders carry out work that has a direct benefit to their community, makes proper reparation for their actions and also encourages the development of personal and practical skills that might hold future benefits for those taking part. Coastal clean-ups and surveys are ideal examples of such an activity and many Local Authorities organise coastal clean-ups in conjunction with Social Services in their area. There is an opportunity within the Marine Litter Strategy to emphasise the benefits of using volunteers or CJSW workers in coastal litter monitoring.

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.**

Comments

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.**

Comments

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

Comments

### **General**

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

Yes  No

It is the experience of the Clyde Forum that it is worth prioritising certain shorelines based on whether they are amenity/recreation beaches and where there are litter problem hotspots so that resources can be efficiently allocated. Other beaches can be cleaned on an ad hoc basis when notified by the public of a problem or following weather events.

The Clyde Forum experience shows that it is relatively easy to produce guidance/strategies but harder to know if the guidance/strategy has been utilised by the target audience. The Forum would therefore suggest that the Marine Litter Strategy includes a review process and timetable which would allow examination of uptake of the Strategy, review of effectiveness, further stakeholder engagement and implementation of improvements.