

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 proposed vision of reducing marine litter by 2020 to such an extent that it does not pose significant risks to the environment or communities is ambitious. The Comhairle agrees that reducing litter at source will be effective but for this to be realised it will require concerted effort and resources to be utilised by all levels of users of the marine and coastal environment.

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 overall reduction in the number of visible litter items such as those which can cause direct mortality through entanglement or indirect impacts such as through ingestion is sufficient within the proposed timeframe to 2020. However, increased surveillance and monitoring is required to enable development of longer term targets rather than indicators for significant reduction in incidence of marine litter into the future.

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?

N/A

Actions

Strategic Direction 1: **Improve public and business awareness of, and behaviour changes around, marine litter**

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?

The focus of education, raising awareness and public participation campaigns should be on the most prevalent items of litter found on beaches, however, consideration should be given to regional variations in the types of litter washed up, and more research may be required to address this.

Campaigns must be ongoing and be sustained into the future rather than being one-offs with short life spans producing limited results and pay-back. Campaigns should be focused on tackling the sources of litter rather than beach cleans although these can be important in raising public awareness.

It is clear that in the case of marine litter the polluter does not pay and many organisations are forced to find the resources and funds to deal with litter caused by other parties. Similarly, while many of the efforts made by local authority and community alike mitigate the short-term impacts of marine litter, they do not directly address the underlying marine litter problem. Furthermore, marine litter represents an additional and unnecessary cost to these organisations, especially at a time when facing increasing difficulties in balancing service provisions with limited funds.

Strategic Direction 2: **Reduction of land-sourced marine litter entering the marine environment, in parallel to the National Litter Strategy**

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.

Although some of the marine litter washed up on the coastline of the Outer Hebrides is sourced from land, much of it consists of storm damaged fishing gear such as petroleum based plastic ropes, nets, and other small degraded pieces which can come from a variety of sources including local as well as from as far as the eastern North American seaboard.

Salmon farms, ports and harbours, shipping companies, etc. operate waste management plans, and other marine users such as fishing vessels, shellfish farms, and other smaller commercial enterprises should be encouraged to have similar waste management plans.

An area of concern for many marine operators is the issue of who is responsible for regulation of marine litter in the marine environment. SEPA has responsibility for regulation of litter on land such as fly-tipping, but only as far as the high water mark. Enforcement of regulations on land is easier where the land owner can be readily identified. Marine litter presents difficulties such that no one owns particular areas of sea, and that in many cases it is difficult to identify the source of marine litter.

The Maritime Coastguard Agency has responsibility for regulation of waste from sources such as shipping and for marine pollution and they will respond to reports of marine litter which constitutes a hazard to shipping. However, it is not clear where responsibility lies for the regulation of marine litter extant nearshore and on the foreshore.

Strategic Direction 3: **Contribute to a low carbon economy by treating 'waste as a resource' and seizing the economic and environmental opportunities associated with the zero waste plan.**

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.

Comhairle nan Eilean Siar operates their Port Waste Management Plan which has been approved by the MCA and can be viewed on the Comhairle website. The Plan is presently under review and will be updated to take account of Scotland's Zero Waste Plan as well as other local issues such as the charging regime.

The Comhairle encourages fishermen and other harbour users to dispose of marine waste including redundant fishing and fish farming gear by providing skips at the Comhairle's piers and harbours. Costs are partially recovered by inclusion of a small percentage in pier and harbour dues with additional rates for items such as waste oil although charges are under review.

As a result of financial cuts the number of skips at Council piers and harbours has been substantially reduced and consequentially this has had an impact on quantities of marine waste and litter that can be collected. Collected material is taken to the Council's waste transfer station for sorting into plastics, metals and wood.

Plastic based materials such as discarded ropes, fragments of nets and other small plastic objects, as well as metals, are frequently degraded and/or contaminated to such an extent that they are not suitable for recycling and instead this material goes into landfill.

The quantity of litter being disposed of fluctuates throughout the year peaking during summer months when there is an increase in the number of visitors and this is particularly evident at ferry terminals. Additional collection facilities such as recycling skips have already been provided or are planned to be put into place for next year.

Any project which establishes a free scheme for disposal of fishing nets at fishing ports across Scotland which includes the infrastructure to recover and recycle the nets and other plastics recovered from fishing operations would require to be adequately resourced in terms of finance, and especially so at a time of significant reductions in available budgets.

The Comhairle would support initiatives such as the suggested Recycle and Reward pilot, but only if these do not place additional financial burden on the Council.

Strategic Direction 4: **Improvement in monitoring at a Scottish scale.**

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.

Increased surveillance and monitoring is required to enable development of longer term targets, rather than the present indicators set by Descriptor 10 for achieving Good Environmental Status, to enable significant reduction in incidence of marine litter in the years beyond 2020.

All the listed actions are important but action should be co-ordinated and results disseminated to interested parties while monitoring continues and not just at the end the monitoring period, e.g. 2020.

Strategic Direction 5: Stakeholder engagement at the UK, EU, and international scales.

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.

All the listed actions are important and the Comhairle would welcome a national group which would co-ordinate the overall strategy and share best practice amongst all those with an interest in reducing marine litter.

Regional Marine Plans could have an important role in implementation of the Strategy at local level and, again, this would be welcomed by the Comhairle.

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.

Given present financial circumstances focusing on deliverables within resources available would seem to be reasonable as described in Option 4. However, sight should not be lost on targets which could be achieved in the years beyond 2020 when, hopefully, the present financial situation might ease.

Equalities

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

Yes No

None

Strategic Environmental Assessment

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

Yes No

None

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

None

General

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

Yes No

None