

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No

Comments

The Marine Litter and National Litter Strategies are closely linked yet the timescales seem to differ, with the National Litter Strategy having a focus in 2014 and the Marine Litter 2020.

We also do not feel that the GES deadline of 2020 should be seen as the target, the strategy should be implemented as soon as possible and updated regularly to ensure it is relevant/effective.

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.

Comments

While we agree with the intention of the vision, it is not a SMART target or achievable. The vision has to be measurable and baselines need to be established.

Even if you managed to stop new littering in Scotland, there is already a lot of litter in the marine environment and you have no control over marine littering from other countries making its way to our shores.

We are concerned about some of the other statements in section 2, such as a focus on prevention of litter at source rather than clearing of current/new litter until after 2020. Some of the most harmful litter is already in our waters and needs to be targeted.

We also feel micro-particles, chemicals, industrial waste and other pollutants need to be addressed alongside the visible litter. For example, your aspiration to prevent litter at source could extend to working with toiletry and cosmetic manufacturers to remove micro-plastics from their products.

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

Comments

Yes, we think additional action is necessary. Scotland is already doing more than the rest of the UK in respect to terrestrial litter and we feel this should also be applied to its approach to marine litter. This is especially important as the Scottish economy is so heavily linked to the marine environment.

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?

Comments

Q5 Specific targets can give the strategy focus however there needs to be flexibility in the strategy to adapt to any new data/technology etc. and to ensure suitable projects can be supported, even if it is not within the strategic directions/actions. There will also need to be regular reviews of the directions and actions to ensure they are as effective as possible.

Q6 The strategic directions are too heavily reliant on the National Litter Strategy and should have more of a marine litter focus to address the issues unique and/or more important to the marine environment.

We would also like to see more about dealing with micro-particles and reducing the amount of waste already in the marine environment.

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?

Comments

Q7 Litter needs to be addressed on and off shore and on a global scale. Education needs to extend to the items that can't be found on the beach, such as micro-particles. We support the removal of plastics at design stage and would like to see this extended to micro-plastics.

Q8 Both are required, as well as additional actions related to our points above.

Q9 Some actions could be addressed by existing schemes/groups, such as MCS. However existing organisations will require resources and funding to expand their remit/activities, which needs to be considered.

With regards to manufacturers, as well as redesigning packaging and products there could be financial penalties on the most harmful/prevalent items to reduce use/encourage development of alternatives.

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.

Comments

Q10/11 Both are valuable schemes which complement each other and are of equal importance.

Q12 Current schemes, such as Fishing for Litter, could be expanded but again it will depend on the resources/finance available.

Q13 The list of existing actions gives the impression that these are more advanced than they actually are. We would like to see these moving faster.

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

Q14/15 Again both are required, as increased recovery/recycling of marine litter and business waste is very important. However some of the bigger issues which also need to be addressed include:

- There is often no route for recycling soiled marine litter
- There is often no end user for the recycle of many waste materials.

These areas require research and investment as well as thought put into who the end users of the recycle will be. End markets have to be identified/available before investment in recycling routes is made.

Q16 Again existing organisations, such as KIMO may be in a position to deliver some of the actions but it will depend on current and additional resources required.

Q17 Again, we would like to see many of these actions at a more advanced stage before we could give comment.

Another point to note is that the segregation/recycling schemes referred to will require additional resources/funding in each of the areas it is introduced.

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.

Comments

Q18/19 Aligning all the information already gathered is a very good idea and we hope this can enable a baseline for marine litter to be established, as we feel this is very important to the Marine Litter Strategy.

Standardised data collections where possible will also help to align future monitoring. However, you do need to be mindful that many of the monitoring schemes, especially those on a European and/or international level, may not be appropriate for Scotland.

We also support the actions related to better use of existing resources/vessels. As the actions identified complement each other, all are important.

Q20 Again, some actions could be carried out by existing organisations/schemes but this will depend on additional resources/funding.

Q21 We would like to see many of the existing actions moving faster and at a more advanced stage.

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

Q22 OSPAR currently only has a UK delegation, and their meetings do not always include a Scottish representative. As our marine environment is closely linked to our economy, we feel Scotland's voice should be heard. Our environmental targets are often more robust and ambitious than the UKs, and we feel an independent delegation would better represent Scotland.

If the regional marine plans are to incorporate marine litter, it needs to ensure existing litter and that which is not visible are also included.

Q23 As a mix of actions are required, you cannot rate one above the other.

Q24 They could be provided if sufficient resources/funding available.

Q25 Scotland should try to incorporate the wider issues we have highlighted into the MSFD.

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

Any campaigns/action must be backed up with sufficient funding/resources to ensure their success. Therefore, We suggest the lead authority and policy officer seek funding from national, European and international funds/schemes to develop existing projects and bring new projects.

Equalities

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

Yes No

Comments

Due to the distances and costs/infrastructure involved, rural areas may find it harder to support segregation/recycling schemes than others.

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

Comments

We would like to note that micro-particles and existing litter should be more integrated into the strategy to ensure these issues are addressed.

We are also aware of State Aid issues with ZWS funding and would like this to be reviewed.