



## **DRAFT KIMO UK response to the Scottish marine litter strategy consultation**

The UK Governments proposed target for marine litter is remarkably weak and efforts made by the Scottish Government should go over and above the agreed targets. We would also like to raise the issue of landfill tax charged on marine litter removed from the sea. The landfill tax works on the polluter pays principle but in many cases, such as the Fishing For Litter project, it is not the polluter who is clearing up but volunteers and grant funded projects. Marine Litter collected on beaches and from the seabed etc. should be exempt from the tax. If this was to happen then funds could be diverted to increase the amount of litter removed.

Q1 – It is natural that the process should follow MSFD /GES timescales to some extent but in reality marine litter is a growing problem and the quicker Scotland specific solutions are implemented in a coherent manner the better. It is very important that the timescales for implementation are not delayed and that 2020 should not be seen as an end point for efforts but as a natural point to review progress. The biggest worry with timescales are those linked with the terrestrial litter strategy, as they do not fit with MSFD timescales and there is a danger that nothing would be done for a number of years.

Q2 – The vision statement, as with many government statements, could benefit from clearer wording i.e. would any reduction be deemed a success or should a noticeable/significant reduction be the goal? In the vision (and document) it is not made clear what “*significant risks to the environment or communities*” are and therefore how progress against this target can be made/measured. There are many direct and indirect effects of marine litter on fauna, communities and economies and it is hoped that any negative risks to all of these will be taken into account.

Q3 – In addition to the points raised above it is hoped that the vision will look to exceed the efforts that will be required to meet the UK's MSFD/GES commitments, the Marine Litter Strategy should be seen as an opportunity for Scotland to lead the way in tackling marine litter not merely a box ticking exercise to meet requirements that will have to be met regardless. A significant reduction in the amount of marine litter would be a real success.

We are pleased that the strategy will focus on both tackling litter at source and supporting removal.

Q4 – Additional action should be taken. The level of ambition shown by the UK government in its approach to Descriptor 10 is weak and is unlikely to

have a noticeable effect on marine litter levels. Given the importance of a clean marine environment to the economy of Scotland, and in particular to many rural communities, marine litter should be seen as a threat to the reputation of the nation's tourism and food production and tackled accordingly. As KIMO has shown marine litter costs many sectors significant amounts of money to tackle marine litter and is not just an aesthetic issue.

Q5 –It makes sense to make overarching statements that will drive the work of the strategy BUT if they are the only words that will govern all the work performed under the strategy then they must be robust.

Q6 – The strategic directions are a good start. KIMO feels that although prevention is better than cure, there is a large amount of marine litter already in our seas and efforts must be taken to remove it (where possible and economical). A strategic direction to this end would reflect the statement made in paragraph 2.8 on page 14 of the consultation document. As with all litter issues though the biggest reduction in the amount of litter in our seas will be through awareness efforts.

Q7 – KIMO approves of the possible actions, they reflect efforts being made at a European level and implementing specific solutions at a national level, reflecting the priority litter items, is likely to speed up a reduction. Involving industry/producers is very important as they have the potential to change consumer practices quicker than some other methods of education.

Q8 – As stated above, having industries involvement is important but KIMO believes that a varied tool box of actions should be used to tackle the marine litter issue. By tackling the issue from a number of angles the solutions implemented are more likely to have a long term effect.

Q9 – Current activities do not tackle all aspects of the marine litter issue. The strategy should both help improve the effectiveness of current activities and be used to help develop new projects/ideas. In the opinion of KIMO there are a number of projects that could be implemented if the appropriate funding and/or resources were made available.

Q10 - KIMO believes that the possible actions both have merit. Cooperation with Scottish Water should also be included as a potential action here.

Q11 – KIMO believes that both are important. Both will help with the marine litter issue and it will depend on the type of litter and location as to which is the preferred action.

Q12 – KIMO believes they will have more impact if they are left as stand-alone actions.

Q13 – The aspirations of the existing actions are all admirable but in our experience many of these have been talked about for some time with little or no positive action having been implemented on the ground. The existing actions would be best improved by imposing deadlines that fall in the next few

years. Many also rely on decisions to made at an EU or International level so where possible Scotland should look to implement best practice at an earlier date.

Q14 – Both actions are admirable but the reality is that they can only be implemented if there is an end user for the recycle produced by such schemes/actions. If manufacturers cannot use the collected material then improved collection, while helping to reduce the amount of litter in the sea, may lead to other disposal issues. It is very important that these actions are linked to the efforts to engage industry.

Q15 – Given that much of Scotland's coastline is distant from potential markets the action looking to incentivise the correct disposal is likely to have more impact on the amount of marine litter generated locally.

Q16 – Others are better qualified to comment.

Q17 – Some of the existing actions are not yet at a stage where they can be deemed a success or not and therefore efforts must be made to both implement them and review their effectiveness.

Q18 – KIMO agrees with the list of possible actions

Q19 – It is important that the data collection is standardised where possible so that it can be compared at a variety of levels but in terms of helping meeting the strategy the most important action is to establish a baseline against which progress can be measured, however this should not be done instead of tackling this issue but concurrently. Any data collected should also be representative of the Scottish shoreline. Most data currently standardised at an international level is collected from long sandy beaches and they only make up a certain percentage of Scotland's shoreline.

Q20 – There are overlaps but I should think that Marine Scotland and Marine Scotland Science are best placed to answer this question fully.

Q21 – The existing actions need improved if they do not meet the criteria established in the list of possible actions detailed below them so in all likelihood, yes.

Q22 – Agree with the possible actions.

Q23 – A combination of all three actions is important.

Q24 – The current actions are concerned with international cooperation while the possible actions are focused on a national/local level. While there is likely to be overlap the possible actions are needed as stand alone actions.

Q25 – No comment

Q26 – KIMO believes that a composite of options 3 & 4 is probably the best option, it is likely to ensure that efforts are not duplicated unnecessarily but also ensure that new and novel approaches can be tested if needed, something that would be unlikely or slow to happen if the implementation was centralised. It will also mean that local issues can be prioritised rather than a one size fits all approach. The biggest worry with option 4 is the unknowns, given that we do not know current budget levels how can we comment if they are sufficient. If the marine litter issue is to be tackled effectively then it must be backed with the necessary resources to succeed otherwise the strategy will be nothing more than a paper exercise.

Q27 – 30 – No comment.