

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No

Close alignment with Marine Strategy Framework Directive (MSFD) timescales is beneficial, both in the initial period for the Strategy (2020) and the proposed time for reviews (2015, 2018).

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 level of ambition of the draft vision is sufficient, if a strong enough assessment process is used to show that marine litter “does not pose significant risks to the environment or communities”.

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

Current understanding of the role of litter in the marine environment is limited. This is being acknowledged in the UK Marine Strategy Part One. Therefore, while the Good Environmental Status (GES) under Descriptor 10 will be sufficient now, it is bound to change when research into marine litter improves our understanding. Also the findings of the Marine Strategy Framework Directive Task Group 10 Report, Marine Litter (2010) should be considered and additional targets and indicators added once information is available.

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?

SEPA would welcome an additional Strategic Direction addressing the reduction of sea-sourced marine litter, especially “ghost” nets, nylon rope and enforcement of no litter discards at sea. Some of this is currently covered under Strategic Direction 2.

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?

Both actions listed are very important.

- Education and awareness raising – this needs to be sufficiently well resourced to be effective.
- Low litter products - there are examples of products which have been designed to avoid marine litter problems (eg degradable cotton bud sticks) but these are not widely available in Scotland. Greater uptake of these products may require intervention – eg through industry voluntary agreement, labelling, promotion, product standards etc.

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 existing actions need to be strengthened in order to lead to a measurable reduction in marine litter. Some of the existing actions listed

are still in the very early stages of implementation. The incorporation of marine litter reduction into regional marine plans would be a good measure. Two of the main items of land based litter are plastic bags and bottles. SEPA supports the introduction of a carrier bag charge, as recently announced by the Scottish Government, and the Zero Waste Scotland (ZWS) pilots of deposit return schemes for drinks containers. Mechanisms should be explored to ensure the return / recovery of other common items of marine litter eg fishing nets, plastic fish crates – for instance deposit /return, leasing schemes, and improved recycling infrastructure.

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.

All the existing and possible actions in this Strategic Direction are worth continuing / commencing.

In particular SEPA considers there is a need to promote to the requirement to recycle contained in the Zero Waste Regulations, which applies to all waste producers. As from 1 Jan 2014 all waste producers must separate glass, plastic, metal, paper and card for recycling. Communications could be tailor made for the marine sector – as is being done for a few other key sectors.

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.

The existing actions need to be strengthened in order to provide the baseline data required for Marine Strategy Framework Directive (MSFD). The voluntary monitoring of beach litter has temporal and especially geographic gaps that need to be addressed. Scottish Government could support this through incentives for volunteers.

There is an urgent need for more research and monitoring to establish baselines for water column and benthic litter as well as microplastics in water, sediment and marine organisms. More cooperation of research providers and agencies should be promoted and knowledge exchange with the plastic industry, and maybe some funding for research, should be facilitated.

Microplastic monitoring is still being developed and trialled. The consultation document does not provide background information about the special issues concerning microplastics in the environment.

There should be more coordination with national and EU partners to develop and standardise methodology; avoiding duplication of effort.

Making use of monitoring opportunities as “add-ons” to existing activities (fishing vessels, fisheries patrol vessels, ferries, ships-of-opportunities).

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.

Continued participation with the UK implementation of Marine Strategy Framework Directive (MSFD) and OSPAR convention measures are fundamental for the reduction of marine litter. Work on marine litter needs to be coordinated among all stakeholders (government agencies, non governmental organisations, academia) in order to standardise and avoid duplication of effort. This could happen on Scottish or UK level.

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.

The networked approach described in option 4 is the most appropriate mechanism. However, some concerns exist about the focus on deliverables within the resources available, as this might not be sufficient to establish the required baselines and to affect the abundance of marine litter to achieve measurable decrease as detailed in the target for Descriptor 10, of the Marine Strategy Framework Directive.

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

SEPA is commenting separately on the joint Strategic Environmental Assessment of the Litter and Flytipping / Marine Litter draft strategies.

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

SEPA would like to see more detailed action to address:

- Micro plastics
- Clean-up of legacy marine litter.