

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No

The GRAB Trust and ABBF believes that the problem is on the increase and the implementation of a government strategy must be a priority. However, we believe that the timeline seems a little optimistic when considering the length of time it takes to collect data. A monitoring programme needs to take into account seasonability and geographical location to carry out marine litter surveys.

The UK Marine Strategy Part One sets the following milestones:

- By July 2014 establishment of a monitoring programme
- 2015 proposed review
- 2016 establishment of a programme of measures
- 2018 proposed further review

The time allocated to the establishment of a monitoring programme (1 year) and a programme of measures seems a bit tight.

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 GRAB Trust and the ABBF would like to include in the vision; the establishment of recycling plants (including industry) that can fulfil the vision of recovering waste resources.

It is becoming ever more difficult to find a market for extracted recyclates. The percentage level for contamination can be as little as 2%. Anyone who collects marine litter in quantity knows that it is not at all practical to have to clean items collected before processing them for recycling. The fact that Scotland has no recycling plant that deals with either clean high quality or contaminated low quality waste and simply relies on commodities groups to sell it to China is severely restricting our options on what we can and cannot do with hand sorted recyclates. We sell waste to the highest bidder, we do not recycle it and it seems that extracting the energy it contains is not a priority. We are now having to send tonnes of plastic to landfill because it is not financially viable to reprocess in this country. The Marine Litter Strategy has to be seen as part of the wider issue of this country lagging behind in

reprocessing waste while others advance.

The Marine Litter Strategy must include targets for the reduction of litter which may not be visible, for example micro-plastic accumulations along our coastlines and coastal waters.

We confer with the Keep Scotland Beautiful response in that this consultation suggests that litter from land based sources will not be tackled by the marine litter strategy, however it is important that litter on the coastal fringes (beaches / above high tide marks) is monitored as part of this picture as the two types are intrinsically linked.

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

Actions under Descriptor 10 will not be sufficient in Scotland. Additional action would be required, including promoting regular beach cleans and marine litter surveys. It is imperative to note that there is no target or indicator to monitor micro-plastics in marine animals; this must be a consideration under Descriptor 10.

It is not realistic or sustainable to rely only on volunteers, community groups and NGOs to carry out beach cleans and litter surveys several times a year. There has to be a willingness to clean up the coastline as well as using preventive measures. The Scottish Government must lead by example.

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 GRAB Trust and the ABBF is in broad agreement with the Strategic Directions as stated in the Marine Litter Strategy, although we do have some comments:

Strategic direction 1: We would like to include “educational facilities”. There

has to be an effort to include marine litter in the curriculum and the education system, not just a poster campaign.

Strategic Direction 2: We would like to see reference to work on-going in Europe (*The Clean Europe Network*) and further afield, as detailed in the document summary, litter which lands on our shores and seas can be sourced to areas outside our seas and from terrestrial sources in other countries.

We would like to see a new strategic direction (Strategic direction 6) to manage a programme to clean the coastline providing local jobs to carry this out. This programme should take into account the existing network of organisations, volunteers and environmental groups. The information gathered by some of our group members (Re-Jig (Islay) and Beachwatch Bute) regarding marine litter collected from our coastline has not been utilised.

In addition, we are in agreement with Keep Scotland Beautiful in that the link between the National Litter Strategy cannot be seen as the only way of delivering Strategic Directions 1 & 2, particularly if the timescales are different. With implementation of the National Litter Strategy not due until 2015, when the review of the Marine Litter Strategy is proposed, and when monitoring of Good Environmental Status is due to be established in summer 2014. There is the possibility that these important strategic directions will not be implemented in line with the others, and that implementation may be put on hold.

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?

We believe there is a lack of recognition of existing actions taking place all over Scotland. There are community groups, volunteers, schools and local NGOs carrying out beach cleans, delivering education on marine pollution and raising awareness to the public in general. Their work should be recognised by the Marine Litter Strategy. Local initiatives such as Beachwatch Bute, Re-Jig (Islay & Jura) and The GRAB Trust (Argyll and Bute) to name but a few, all work to raise awareness and to reduce the problems caused by marine litter and pollution.

The GRAB Trust lends cleaning equipment, provides small grants and offers advice and support to organise village, roadside and beach clean ups. During the financial year 2012-2013, The GRAB Trust has facilitated or organised beach cleans (including a small number of village clean ups) in the area involving more than 500 children and more than 400 adults. This has resulted in more than 100 miles of Argyll's coastline has been cleaned.

The GRAB Trust promotes KSB "Clean Up Scotland" campaign and several of our local organisations have taken part in the campaign. We agree with KSB comment that it would be confusing to launch a new campaign. Similarly we support the MCS's Beachwatch weekend and we believe more effort should be put towards the promotion of these events.

In response to Q7, we would stress the importance of fixed penalties as a broader move towards deterring littering and fly tipping. There needs to be higher fines: £100 and £300 fines or higher (£1000 respectively) should be considered.

Regarding education, we would like to see a serious commitment to include marine litter and pollution in the curriculum. We believe a poster campaign would not achieve a change in attitudes. As part of The GRAB Trust's education programme and despite our limited resources, during the financial year 2012-2013, we delivered workshops on marine pollution in more than 30 schools and to more than 700 pupils ranging from pre-school to secondary schools.

We also organise several education days every year where we invite other organisations such as, SAMS (Scottish Association of Marine Science), SNH, HWDT (Hebridean Whale and Dolphin Trust) to deliver workshops on marine science, marine litter and pollution. Many local primary schools come along and over 200 pupils can take part in these events. We would like to see the Strategic Direction 1 to incorporate some of these approaches to education and we would welcome more support to the work we do.

Regarding other possible actions we would like to see:

- Working with the Eco-schools programme to include a marine litter topic
- Setting up grants as an economic incentive to clean up the coastline and carry out marine litter surveys as it happens in Argyll and Bute
- More financial support to local charities that work raising awareness on marine pollution such as the Beaches and Marine litter project run by The GRAB Trust in Argyll and Bute.
- Co-ordinate and support best practice projects/activities that raise awareness on marine pollution
- Employing marine rangers to monitor, educate and police

Regarding producers, we believe that a stronger stance should be taken and ban products that pollute the environment such as plastic cotton bud sticks. Producers will soon replace offending materials. We believe the use

of plastic bags and plastic bottles represent a serious source of marine litter and action to reduce their use should be a priority. Industry awareness and behaviour change needs to be encouraged as high priority.

As well as the possible actions discussed, there must be a stricter approach to tackling littering. For example, when public leave their litter on beaches; More people should be given powers to raise on-the-spot fines such as beach rangers. This would act as a deterrent. Similarly, councils need to have funding to provide necessary means to reduce litter on beaches, whether this means more bins or more personnel to empty them.

Q8: We believe action 2 is more important.

In response to Q9, additional direction, resources, and a consistent Scotland wide approach are needed under the Marine Litter Strategy to ensure that a significant difference is made. More action is needed to resolve Scottish marine litter as mentioned above. Moreover, additional funding is required to support local organisations that already deliver education workshops and raise awareness on marine litter and pollution.

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.

In response to Q10, expanding the fishing for litter initiative can only increase awareness, its impacts and help contribute to an overall reduction in marine litter. Incorporating marine litter reduction initiatives into regional marine plans under the Marine (Scotland) Act 2010 can also assist in the goals mentioned above.

In response to Q11, the most important possible action to help deliver the Marine Litter Strategy would be to incorporate initiatives into regional marine plans under the Marine (Scotland) Act 2010, and under SEPA's new litter guidelines from the *River Basin Management Plan for the Scotland River basin district 2009-2015*.

More can be achieved under the Marine (Scotland) Act 2010 by empowering marine rangers and duty bodies to deliver on the ground (i.e. through identifying and supporting opportunities for recycling and reuse of

coastal and maritime sources of litter) and not just having actions stipulated in regional marine plans.

Regarding Q12 we would like to see a financial commitment to expand the Fishing for Litter project.

In response to Q13, as mentioned above. Point 4: We would like to add: to provide / improve recycling facilities.

Regarding points 3,4,5,6,7,8 they are very vague. We believe the inclusion of timescales or more detail will strengthen the Strategy.

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.

In response to Q14, both actions are welcomed as they can act as incentives to increase recycling and correct disposal of waste. More advice is needed for volunteers and NGO's regarding what marine litter can be recycled from beach cleans. At the moment because of contamination, not much of the marine litter collected can be recycled.

Regarding question 15, we believe the Recycle and Reward pilot is the most important action to encourage recycling and proper disposal of waste. The Recycle and Reward scheme could be delivered under Zero Waste Scotland.

Regarding Q16, We believe more funding is vital to investigate both points and to create grants and financial help for clean technologies.

In response to Q17, Point 2: "to encourage" is very vague. It would be better "to provide" or "to make available"

Point 3: add beach cleans. The existing actions are satisfactory but they need timescales, it is not clear if they have been implemented already (point 3).

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.

In response to Q18, in agreement with the comments from Keep Scotland Beautiful, of which state: *'The Marine Litter Strategy must link to the recommendations made by the Marine Strategy Framework Directive subgroup on litter. This will ensure consistent methodology, and should link through all possible actions. However, care must be taken to ensure that the EU methodology accounts for the specific nature of Scotland's vast and varied coastline and seas.'*

In response to Q19, Alignment of Non-Governmental Organisations and develop a baseline for coastal litter, and point 4.

In response to Q20, more action is required to fulfil the proposed actions under the Marine Litter Strategy. The GRAB Trust and ABBF would recommend that 'hot-spot' beaches/coastal areas are identified within each Local Authority area as reference beaches. In addition to this, local volunteer groups and local environmental NGOs must be encouraged to conduct quarterly surveys on those beaches using the Marine Conservation Society's Beachwatch scheme, and/ or the OSPAR guidelines.

In response to Q21, no comments.

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.

In response to Q22, we agreed with the possible actions.

In response to Q23, by ensuring that regional marine plans consider scope to reduce marine litter. In addition, a further action could see the creation of

a national steering group on marine litter that shares and prioritises good practice on implementing the marine litter strategy.

Regarding Q24, further action is required to deliver these actions collectively under the Marine Litter Strategy. The GRAB Trust and ABBF agree with Keep Scotland Beautiful and strongly believes that while existing communications, sharing of best practice and resource sharing currently happens on a small scale, there is willingness for greater collaboration. In order for this to happen consistently across Scotland the Marine Litter Strategy must address all actions.

Regarding Q25, existing actions need to be improved through more engagement with members of the public. This would be a starting point to tackle our marine litter issues.

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.

We believe Option 4 will be the most effective option. Option 4 must utilise and promote the work carried out already by existing networks and stakeholders rather than focusing on high profile initiatives that are distant from the work that is already taking place on the ground.

For Option 4 to be met successfully, it is vital that there is a networked approach (consisting of charities and public bodies), and that adequate resources are provided for. It is essential that resources are reviewed annually.

We are in agreement with the Keep Scotland Beautiful statement: *'If substantial resources are not made available to support the partnership approach, then real on the ground action will not be possible and key elements of the strategy will not be delivered, creating the risk that GES will not be met.'*

Equalities

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

Yes No

No comments

Strategic Environmental Assessment

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

Yes No

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

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 GRAB Trust and the ABBF 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.

Many people in Argyll and Bute are concerned with the issue of marine litter, and as a last resort members of the public regularly clean their local beaches and shoreline. The Marine Litter Strategy should integrate the commitment and the work carried out by local communities and NGO's to achieve its vision.

The GRAB Trust's and the ABBF's experience shows that it is relatively easy to produce guidance/strategies, but harder to know if the guidance/strategy has been utilized by the target audience. The GRAB Trust and Forum would therefore suggest that the Marine Litter Strategy review process includes a timetable which would allow examination of

uptake of the Strategy, review of effectiveness, further stakeholder engagement and implementation of improvements.

Many of the actions mentioned within this strategy will require funding. We believe that it is important to establish a reliable source of funding for the implementation of the strategy. We therefore would like to see a tax mechanism introduced; for instance a plastic bottle tax introduced (similar to the tax that the Scottish government will impose on plastic bags) that will be ring fenced to fund coastline monitoring and cleaning programmes.

The GRAB Trust and Forum are also concerned with the allocation of the budget between the Scottish regions. The Argyll and Bute region covers a large area and has an extensive coastline including many remote coastal areas. We would like to see a budget that would allow for the implementation of a realistic plan to tackle marine pollution litter on our coastline.