

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No

We broadly agree that the Marine Litter Strategy timeframe should be closely aligned with implementing the Marine Strategy Framework Directive i.e. the initial period for the Strategy would be to 2020 with the achievement of Good Environmental Status, with reviews proposed in 2015 and 2018.

However we note that the UK Marine Strategy Part One sets out to have a programme of measures in place to achieve Good Environmental Status by 2016 and we question why the Scottish target is not more ambitious and aligned with the UK Strategy?

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 Trust broadly agrees with the Vision. However as with the timescale we believe it should be more closely aligned to the MSFD re the 2020 target for Good Environmental Status and that 'significant risk' should be replaced with 'harm' e.g. 'By 2020, Scotland's marine environment will have achieved Good Environmental Status, with marine litter reduced so that it does not cause harm to the coastal and marine environment or communities'....

The Vision rightly identifies that this can only be achieved by behavioural change in Scotland, but it will also require a co-ordinated approach working across borders, as not all waste comes from Scotland and so the Strategic Direction (SD) 5 – stakeholder engagement at the UK, EU and international scale, will be crucial.

The Vision should be more ambitious with marine litter reduced so that it no longer causes harm. Not posing a 'significant risk' is insufficient.

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 UK characteristics and associated targets for GES are broad, but lack detail and specific targets. Whilst recognising that a lack of data and therefore a baseline is an issue, the Trust would like to see Scotland set ambitious targets which are likely to require additional actions and therefore resources.

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 Trust supports each of the Strategic Directions (SD) as outlined. However we make the following suggestions to clarify SD1 and the need for an additional SD. Behavioural change, both public and business is crucial in tackling the marine litter issue. However it is unclear whether SD1 covers people and businesses that contribute to the marine litter issue through terrestrial waste, or whether it refers to people and businesses that contribute to the marine litter issue from the marine activities they are involved in.

To clarify, we suggest that SD1 reads 'Improve public and business awareness of, and behaviour changes around, litter'. We suggest the removal of the word 'marine' in this sentence as it suggests this SD is aimed at only those involved in marine activities and not those who produce the other 80% of marine litter that comes from terrestrial sources. The final sentence 'and will link with marine activities' also needs slight rewording to make clear that this SD also covers those involved in marine activities.

The Trust would like to see a new SD to tackle the current litter problem.

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 possible actions are important, but the accompanying text must make clear that it is aimed at those that contribute to the marine issue through terrestrial waste and also those involved in marine activities that contribute to the marine issue. The focus of the education programme should also include the impacts of marine litter on marine species and seabirds.

Influencing manufacturers is a very important action.

If this is to be addressed through the National Litter Strategy, the NLS must identify beach litter as a key issue (which it does not currently do) and one that requires a co-ordinated and concerted effort to address and to monitor. Additional resources will also be required.

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 and possible actions set out on p17 do not appear to correspond to SD2 about land-sourced litter and the National Litter Strategy.

With reference to the existing actions on p17 the Trust supports actions that make it easier for all boat owners/users to dispose of waste responsibly. This can only help cut waste discarded directly into the marine environment.

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.

Incentivising recycling and correct disposal will be very important if marine litter is to be reduced. Making it easier to recycle, reuse and dispose of waste responsibly will also be important.

As well as seeking investment for environmental and clean technologies that facilitate recovery, recycling and environmental monitoring, which we support, the Scottish Government should also be putting resources into this directly.

Lack of data has already been identified as a significant problem in our ability to tackle marine litter and so environmental monitoring of coastal and marine industries is an important step in addressing this and seeing how trends develop over time. It will also enable these industries to be held to account if they do not meet required standards.

Investing in environmental and clean technologies to facilitate recovery, recycling and environmental monitoring in coastal and marine industries will also be required.

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.

All the possible actions are important – creating a baseline for coastal litter, seabed and water column; identifying gaps in our knowledge base and current research programmes so that priorities for the future can be identified; aligning existing monitoring programmes and developing a standardised monitoring approach across the EU and using fisheries research vessels to contribute to data

collection.

In particular, resources must be devoted to monitoring beach litter. Currently the majority of coastal litter monitoring is carried out voluntarily and this is inadequate. There needs to be a national coastal litter survey initiative that targets a range of beaches from heavily used popular ones to unused ones, remote from terrestrial sources.

More research is also needed into the growing problem of plastic micro litter in terms of quantity, source and impacts. Plastic micro litter is a significant issue in the marine environment.

The impact of coastal landfill sites also needs to be evaluated – both those currently used and historical sites.

Prioritising an initial evaluation on the current state of research to give a scientific and technical basis for monitoring, knowledge gaps and priority areas for research is the most important action.

All these actions are likely to require additional resources and these should be made available.

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

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.

Option 4 sets out to deliver some of the elements of the strategy within existing resources. To only set out to achieve some of the strategy shows a lack of ambition to really bring Scotland's marine environment up to Good Environmental Status and puts at risk the many environmental, economic and social benefits that it currently produces for the people of Scotland and more widely. We also believe that additional resources will be required if a real difference is to be made with marine litter and Option 4 clearly states that no new resources would be available. Much of the work that is currently carried out is piecemeal and varies across the country, as the consultation paper sets out. Option 4 would co-ordinate these resources and activities which may improve the situation to some extent. However without additional resources and incentives, the Trust does not believe just co-ordinating current resources and activities would be sufficient to really tackle the problem.

Scotland's marine environment is a key resource providing innumerable benefits to society. It already falls short of Good Environmental Status and if this is to be achieved by 2020 the marine environment must become a priority and the resources and ambition provided by Government to enable that to be achieved.

Government commitment, co-ordinated activity and creating a national stakeholder group will be crucial to tackling this problem. Additional resources to fund nationwide campaigns both to remove existing litter and to bring about a change in behaviour and attitudes to litter will be crucial. Additional resources for research and monitoring will also be crucial.

From the options put forward, we believe Option 3 is the only one that will really tackle the marine litter issue.

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

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