

CONSULTATION QUESTIONS

Structure

Q1. Do you agree with the timescales outlined?

Yes No

Comments

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.

Although we agree with the general ethos of vision, use of the term 'significant risks' could lead to reduction in actions that should be required. Some people may feel that by doing the bare minimum they are avoiding 'significant risks' when the vision should really be encouraging 'above and beyond' changes.

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

In the absence of a baseline it is difficult to say whether additional actions and/or targets will be required

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?

Again mostly agree with the Strategic directions outlined.

SD2 – talks about land-sourced litter yet page 16 outlines 2 sources (land and sea) and in addition the existing actions and proposed actions are all related to maritime activities. We would suggest that either this direction is reworded to include both land sourced and sea based sources or that the direction is split. In addition, although in some coastal areas the percentage of litter on beaches is mostly from landbased sources in others (eg Shetland) it is mostly from maritime sources – this direction needs to be able to reflect these geographic/industry differences and ensure that appropriate actions are not excluded by, for example, assuming most litter is only from one particular source.

SD4 – Agree that monitoring improvement is required. It would be useful to highlight what this would include – beach surveys, seabed surveys or surveys of port facilities? Peoples opinion? Is the aim to monitor the issue, impact or how actions are being achieved?

Additional direction: In order to really tackle the problem, we feel that a direction looking at enforcement or regulatory options should be explored. For example is new legislation needed? How could this subject be included in plans and projects (including National Marine Plan)? What enforcement or incentive is required. We have seen that having some legislation has helped on land whereas despite numerous voluntary initiatives, there is still a major issue in the marine/coastal 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?

Education can be a powerful tool if applied carefully. The focus should be on both the types of litter found on beaches but also the likely sources (bearing in mind the geographic differences) and the impacts (environmental, economic and social) that it causes.

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.

For this direction, there is a large list of existing actions. From my experience in this subject (and research when with KIMO), I am not convinced that all of these actions actually happen and certainly not across all ports in Scotland. Therefore a new action would be to assess the existing actions to see a) how they are working and b) what the geographic spread is of them.

Possible actions – whilst we agree that the Regional Marine Plans should include policies to tackle marine litter, they will take their direction from the National Marine Plan. Therefore we feel that the National Marine Plan needs to outline the Marine Litter Strategy’s vision and objectives at the strategic level so that the Regional Marine Plans can develop policies and actions to help deliver the outcomes.

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.

Again, we are not convinced that the existing actions are happening at all locations.

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.

Agree that better co-ordination is required to sort out monitoring and establish a baseline. Given the scale of Scotland's coastline and seabed, consideration will be needed in identifying what areas should be monitored. The baseline and subsequent goals will be different throughout the country depending on the source of litter and what actions are required. There may be opportunities to include basic litter surveys within existing work. For example, SNHs remit – litter surveys could be covered within Site Condition Monitoring work.

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.

A steering group or working group is a good idea. It would be useful to include an action on investigating best practise elsewhere and implementing here rather than having to start from scratch. For example, the Swedish led 'Save the North Sea' project (from which fishing for litter and the fulmar plastics study arose from) also developed a training package for merchant shipping cadets all about marine litter. This could easily be adapted and rolled out to colleges in Scotland.

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.

Although the strategy needs a national (centralised) steer and support, it also needs to be flexible enough to adapt for the very different coastal communities that exist throughout Scotland. A networked regional approach, tied with Regional Marine Planning, would help develop/prioritise actions appropriate to the location and issues in that area. It would also help foster a sense of ownership which would, in turn, help with changing peoples behaviour.

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

This has been sent to the SEA Gateway

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

SNH welcome the development of this strategy and look forward to assisting with its implementation where there is overlap with our remit. We would be happy to be involved in the steering group if you feel this would be useful.