



Marine Scotland

Analysis of Consultation Responses to the Refreshed
Marine Litter Strategy for Scotland

Final Report prepared by: EKOS Ltd, 22 June 2022.

The opinions expressed in this report are those provided by respondents to the call for evidence.

Report commissioned by:

Scottish Government
Marine Scotland
Victoria Quay
Edinburgh
EH6 6QQ

© Crown Copyright 2022

Applications for reproduction of any part of this publication should be addressed to: Scottish Government, Marine Scotland, Victoria Quay, Edinburgh, EH6 6QQ. This report is published electronically to limit the use of paper, but photocopies will be provided on request to Marine Scotland.

Contents

Executive Summary	i
1. Introduction	1
2. Consultation Approach and Responses	5
3. Strategic Direction 1	8
4. Strategic Direction 2	18
5. Strategic Direction 3	30
6. Strategic Direction 4	38
7. Strategic Direction 5	47
8. Final Comments	51
9. Business and Regulatory Impact Assessment	54
Appendix A: Action Plan	i
Appendix B: Frequency Tables	xiii
Appendix C: Campaign Responses	xxvii
Appendix D: Organisation Groupings	xxviii
Appendix E: Publication of Responses	xxx
Appendix F: Satisfaction with Consultation	xxxii
Appendix G: Marine Scotland Directorate Response	xxxiii

Executive Summary

Introduction

This report presents the independent analysis of responses to the [Consultation on a refreshed Marine Litter Strategy for Scotland](#). The consultation ran from 29 December 2021 to 22 March 2022.

The Scottish Government has made a commitment to refreshing the 2014 Strategy, and Marine Scotland, with and through the Marine Litter Strategy Steering Group, has been engaging with key stakeholders and partners over the last three years to take stock of the original Strategy and to identify objectives and actions to help inform and shape a refreshed Marine Litter Strategy and Action Plan which is currently in draft form.

The public consultation

The purpose of this public consultation was therefore not to repeat the earlier engagement process progressed by the Marine Litter Strategy Steering Group. Rather, it sought feedback on the draft refreshed Strategy and on the range of actions that have been identified as priorities to guide the work of Marine Scotland and partners up to 2027.

A total of 220 responses were received to the consultation and a vast majority were submitted by individuals (75.5%). The remainder were from organisations spanning a diverse range of remits and interests, including: coastal development and conservation; communities; environment and conservation; industry; and other.

The consultation attracted campaign responses, primarily from individual respondents, and these expressed support for a ban on wet wipes containing plastic and support for Extended Producer Responsibility (EPR) schemes. The following is not meant to be an exhaustive list of points raised through the consultation, rather the executive summary presents some key themes. The main report contains the more detailed analysis and a response from Marine Scotland regarding how they will respond to the comments.

Given the cross-cutting nature of the Strategic Directions, some themes were raised throughout the consultation questions. For example, terrestrial litter is mentioned throughout.

Strategic Direction 1: Improve public and business attitudes and behaviours around marine and coastal litter, in co-ordination with the National Litter and Flytipping Strategy.

The vast majority of respondents (individuals and organisations) agreed (i.e. either agreed or strongly agreed) that the planned actions under each of the four objectives would contribute to the achievement of Strategic Direction 1:

- Encourage positive behaviour and deter littering and flytipping (85.5%).
- Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear (86.9%).

- Improve waste management for collected marine litter (87.4%).
- Reduce sewage related debris (SRD) through a behavioural change campaign (84.6%).

More than half of respondents considered there to be omissions or gaps in the planned actions identified under Strategic Direction 1 (57.4%).

The main points raised in relation to the objective to ‘encourage positive behaviour and deter littering and flytipping’ were: greater enforcement of existing regulations; incentivising responsible waste disposal; and EPR schemes. There were also a few comments that called for more technological solutions, such as tagging and tracking of litter, and more effective public awareness campaigns.

In relation to the objective to ‘improve waste management in the fishing and aquaculture sector’, the most common points raised were support for actions that would encourage the fishing and aquaculture sectors to do more in this area, and support for actions which aim to make it easier to recycle gear.

The objective to ‘improve waste management for collected marine litter’ attracted few comments with most commentary concentrated on stopping litter at source. The main feedback also highlighted the challenge of limited facilities in Scotland for the recycling or disposal of end-of-life fishing gear.

Comments regarding the objective to ‘reduce SRD through a behavioural change campaign’ were divided, with many organisation respondents supportive of the planned public awareness campaign, whilst individuals were more skeptical. Many individuals felt that wet wipes containing plastic and/or other single use plastics should be banned or reformulated rather than relying on public awareness raising. Industry respondents (e.g. companies involved in the manufacture of wet wipes and related industries) raised a number of objections to any ban or reformulation of wet wipes containing plastic, and put forward a case that a switch to biodegradable wipes would not be a solution, including that a distinction should be made between domestic and professional use wet wipes.

Strategic Direction 2: Reduce marine and coastal based sources of litter, with a focus on the most problematic sources, in co-ordination with land sourced litter being reduced by the National Litter and Flytipping Strategy.

The vast majority of respondents (individuals and organisations) were in broad agreement that the planned actions under each of the following three objectives would contribute to the achievement of Strategic Direction 2:

- Reduce plastic pellet loss into the marine environment (89.1%).
- Improve the ability of the fishing industry to retrieve lost fishing gear from the sea (82.0%).
- Reduce sources of SRD (86.4%).

Just over half of respondents considered there to be omissions or gaps in the planned actions identified under Strategic Direction 2 (52.6%).

In terms of the actions related to the objective to 'reduce plastic pellet loss into the marine environment', the main points raised centred on: a need for fines/penalties; support for improved monitoring of plastic pellet loss; and support for the adoption of the British Standards Institution (BSI) Publicly Available Specification (PAS) standard as part of a supply chain approach.

Wider points expressed support more broadly for reducing the overall production and use of plastic, microplastics and single use plastic items, alongside research into more environmentally friendly alternatives and materials.

In response to the objective to 'improve the ability of the fishing industry to retrieve lost fishing gear from the sea', several points were raised. As above, consideration of fines/penalties was an issue that was raised here too, and across the consultation. Preventative measures to tackle the issue of lost fishing gear was considered important. There was acknowledgement that progress would be heavily reliant on the ability and willingness of the fishing community to spend time and resources on retrieval and that there were various challenges and external factors at play. Here, various suggestions were proposed to encourage retrieval, including a deposit return scheme, a payment for fishing gear returned for recycling, and a scrappage incentive, to name a few examples.

The actions that support the objective to 'reduce sources of SRD' attracted most feedback within Strategic Direction 2. There was broad support for actions that promoted long-lasting behaviour change and improved product labelling for correct disposal, alongside actions that encouraged better control of pollution incidents and sewage overflow discharges from sewage treatment plants to prevent wet wipes that are not designed or marketed as flushable ending up in the environment.

Two main viewpoints were expressed regarding the proposal for a mandatory standard and a blanket ban regarding the manufacture and sale of wet wipes containing plastic:

- Individuals and most sub-categories of organisation respondents (i.e. all except industry), felt that the action could be more strongly worded/phrased and that the proposed timeframe was not considered urgent or quick enough. Further, there was feedback that expressed support for a wider ban on plastic in other single use items (e.g. tampon applicators, etc), and for manufacturers to be mandated to move to environmentally friendly alternatives within a reasonable timescale.
- Industry (e.g. companies involved in the manufacture of wet wipes and related industries), while supportive of minimising pollution from wet wipes that are inappropriately disposed of, highlighted wider complexities that would need to be considered. For example, the diversity of wet wipes on the market (e.g. domestic versus professional use). Here, it was suggested that any future legislation should make a distinction between wet wipes as is the case in the European Union (EU) [Single Use Plastics Directive](#) (2019/904), in particular given the role that professional wet wipes play in effective prevention and control strategies. It was noted that non-flushable wet wipes, which represent most wet wipes in the marketplace, are not designed to be flushable and disposing of them down the toilet would not be appropriate for a variety of reasons and should be disposed in an appropriate bin. Further work/time was felt to be needed for industry to develop satisfactory alternatives that were effective and not prohibitively expensive e.g. for products used for infection prevention.

Strategic Direction 3: Support the removal of marine litter from the marine and coastal environment.

The vast majority of respondents (individuals and organisations) agreed that the planned actions under each of the following four objectives would contribute to the achievement of Strategic Direction 3:

- Reduce the cost of disposal of collected marine litter (84.4%).
- Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal (91.3%).
- Expansion of the Fishing for Litter project (89.7%).
- Installation of riverine litter removal technology in the River Clyde (84.5%).

Views were relatively mixed - approximately one-third of respondents considered there to be omissions or gaps in the planned actions identified under Strategic Direction 3 (38.0%). A similar proportion were unsure.

In terms of planned actions to support the objective to 'reduce the cost of disposal of collected marine litter', much of the commentary focussed on beach cleaning. Here, it was felt that the Strategy's narrative on beach cleaning could be stronger (e.g. scale of the problem, heavy reliance on volunteers) with some noting that it could be considered as a standalone objective. It was noted that paid staff would be needed over and above volunteers, with greater attention also given to supporting beach cleaning operations in the most polluted areas, those areas not covered by volunteer schemes and/or those areas deemed inaccessible to be cleaned without specialist support. Further, increased funding/support could help local authorities make collection and recycling more accessible.

For the objective to 'increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal', projects such as those run by Keep Scotland Beautiful were welcomed and considered important. However, actions to support the continuation, scaling up and extension of such projects would require additional funding to ensure a long-term focus. The importance of preventing marine litter at source and tackling the problem upstream was also emphasised. The important co-ordination role of Non-Governmental Organisations (NGOs) was also highlighted in terms of their ability to access their pool/bank of volunteers to help conduct much of this work.

Mixed views were provided on the two actions related to the 'expansion of the Fishing for Litter project' objective. On the one hand, the action to 'promote the Fishing for Litter scheme within the fishing industry and to ports, harbours and fishers not currently participating' was welcomed, supported and considered a good approach. An alternative view questioned whether the project had been able to demonstrate success/impact based on funding to date while another respondent felt that the action sought to appease an industry that has caused much of the damage in the first place.

The main points raised on the two actions relating to the ‘installation of riverine litter removal technology in the River Clyde’ objective can be summarised as follows: could the technology be implemented in other river catchments, etc; and there was agreement that the boom installed would need to be appropriately monitored and maintained to ensure no unintended consequences – and followed up with effective community engagement.

Strategic Direction 4: Improve monitoring at a Scottish scale and develop measures for Strategy evaluation.

The vast majority of respondents (individuals and organisations) agreed that the planned actions under each of the five objectives would contribute to the achievement of Strategic Direction 4:

- Use of Fishing for Litter initiative data to evaluate industry engagement (85.9%).
- Accurate assessments of marine plastics in Scottish waters (86.0%).
- Development of an agreed methodology for inter-tidal microplastic monitoring (82.9%).
- Social science evaluation of the Marine Litter Strategy (81.4%).
- An understanding of Scottish island beach litter (89.7%).

Views were mixed on whether there were omissions or gaps in the planned actions under Strategic Direction 4. Around one-third each answered “yes”, “no”, or “don’t know” to the question.

The objective ‘use of Fishing for Litter initiative data to evaluate industry engagement’ was underpinned by support for the planned actions: to ‘increase engagement in both new and participating harbours’, and to ‘improve the quality of data collection’. This was often expressed in the context of fishing debris and waste accounting for a significant proportion of marine litter in Scotland. To facilitate greater industry engagement, a few respondents highlighted the importance of ensuring sufficient infrastructure (e.g. weigh bridges) was available at harbours across Scotland.

To fulfil the objective to provide ‘accurate assessments of marine plastics in Scottish waters’, the planned action to ‘expand OSPAR monitoring beaches to include an open coast northeast beach’ was welcomed by most respondents. More generally, it was considered important to focus on weighing and identifying the source of marine litter. Barriers to accurate assessments were, however, reported as seasonal and geographical variations in data collection and volunteer capacity.

In taking forward the ‘development of an agreed methodology for inter-tidal microplastic monitoring’ objective, feedback from several respondents supported a harmonised approach as set out in the action plan. It was also considered that there would be value in learning from existing methodologies adopted elsewhere (e.g. internationally).

Few comments were provided on the objective regarding a 'social science evaluation of the Marine Litter Strategy'. A point raised was that this may be "too subjective" to gather reliable data. It should be noted that the social science evaluation, by its very nature, is to gauge how individual people value the natural environment – it is not meant to be a substitute for scientific monitoring.

Most respondents welcomed and understood the rationale for including a specific objective that focussed on developing a greater 'understanding of Scottish island beach litter'. Here, there was recognition that marine litter is a significant issue in island communities, and that such communities face a particular set of challenges (e.g. smaller populations, less capacity/resource, logistics, and costs, etc).

Strategic Direction 5: Maintain and strengthen stakeholder co-ordination in Scotland, the UK, regionally, and globally.

The vast majority of respondents (individuals and organisations) agreed that the planned actions under each of the four objectives would contribute to the achievement of Strategic Direction 5:

- Expand communications and understanding of Marine Litter Strategy work with delivery partners (89.0%).
- Build on and strengthen working relationships with wider UK (83.2%).
- Increase engagement with OSPAR through: participation in and implementation of the Regional Action Plan for Marine Litter; and taking a lead role with relevant actions (80.8%).
- Strengthen co-ordination across the British-Irish Council region (83.4%).

A relatively high proportion of respondents overall (and individuals in particular) were unsure whether there were any omissions or gaps in the planned actions identified under Strategic Direction 5 (39.8%). Just over one-quarter (27.6%) said there were omissions or gaps.

The main comments under the objective to 'expand communications and understanding of Marine Litter Strategy work with delivery partners' were primarily from organisations with a focus on communities who noted that community groups were a valuable resource (e.g. litter picking activities, providing intelligence through surveying and monitoring activities, advocates for national campaigns and driving change in their local communities). As such, community groups and volunteers were viewed as an integral part of helping to deliver the Strategy and it was felt that this could be more fully reflected within the document. The importance of regular and ongoing community engagement and involvement was also considered vital.

In relation to 'building on and strengthening working relationships with the wider UK', the most common comments were to stress the transnational nature of marine litter and that collaboration with other jurisdictions was vital, and that having differing standards across the UK (e.g. for wet wipes) could have detrimental impacts on manufacturers and consumers.

There were few comments on the objective to 'increase engagement with OSPAR', beyond a few which welcomed the planned increased engagement. Similarly, 'co-ordination across the British-Irish Council region' was also considered essential.

1. Introduction

Introduction

- 1.1 This report presents the independent analysis of responses to the [Consultation on a refreshed Marine Litter Strategy for Scotland](#). The consultation ran from 29 December 2021 to 22 March 2022.

Context

- 1.2 The [first Marine Litter Strategy for Scotland](#) was published in 2014, after a public consultation process. The Strategy has come to the end of its lifecycle, and the Scottish Government has made a commitment to refreshing the Strategy.
- 1.3 The Marine Scotland Directorate within the Scottish Government is leading this work and a large amount of work has already been undertaken with guidance from the [Marine Litter Strategy Steering Group](#). Membership includes representatives from academia, environmental charities, non-governmental organisations (NGOs), terrestrial litter interests, the fishing industry, and public bodies that have responsibility for dealing with pollution in our environment.
- 1.4 To date, the refreshed Marine Litter Strategy and Action Plan has gone through various stages of engagement with partners and stakeholders. The first stage was to undertake a review of the first Marine Litter Strategy for Scotland and to consider whether the overall aims and intent of the Strategy are still valid and relevant, and that the Strategic Directions (i.e. objectives) consider the correct issues. Review workshops took place in late 2019 and identified the need for some changes in the refreshed Strategy.
- 1.5 Work on the Strategy refresh was paused in 2020 due to the Coronavirus (COVID-19) pandemic. The second stage involved Marine Scotland working with partners and stakeholders to consider which areas were of most concern and what specific actions Marine Scotland could take to effect a positive change. Several online meetings were held during Summer 2021, with further input gathered by Marine Scotland in Autumn 2021.
- 1.6 Taken together, this initial engagement helped to identify actions that could realistically be achieved within the next six years, taking into consideration the staffing and financial resources that Marine Scotland and its partners have available.

Refreshed Marine Litter Strategy

- 1.7 The refreshed Marine Litter Strategy for Scotland has now been prepared by Marine Scotland, with input from the Marine Litter Strategy Steering Group and key stakeholders. The aim of the refreshed Strategy is to contribute to the achievement of Marine Scotland's vision for a clean, healthy, safe, productive, and biologically diverse marine and coastal environment that meets the long-term needs of people and nature. This vision includes managing our seas sustainably to protect their rich biological diversity and to ensure that it is an ecosystem that continues to provide economic, social and wider benefits for people, industry and users of the marine environment. This underpins developments in marine legislation through the [Marine \(Scotland\) Act 2010](#) in promoting sustainable use of our valuable and unique environment.

- 1.8 The Strategy builds on the huge amount of valuable work and initiatives underway at a local, national, regional, and international level that aim to care for the marine and coastal environment. Bringing this work together adds clear leadership, greater co-ordination of efforts, and fresh momentum. Shaped by research and public consultation, the Marine Litter Strategy for Scotland seeks to maximise opportunities and minimise threats in addressing the levels of litter present, and recognises that the [UK Marine Strategy](#) is a key driver. The Marine Litter Strategy for Scotland has been refreshed to reflect the positive progress made since 2014. Whilst the Strategy summarises existing and ongoing actions, the main focus is the new planned actions that have been agreed as priorities.
- 1.9 The vision for this lifecycle of the Marine Litter Strategy is a Scotland where the issue of marine and coastal litter is acknowledged by all sectors, and measurable steps are taken to prevent marine litter as well as to support removal initiatives. This will be achieved in co-ordination with the National Litter and Flytipping Strategy and through collaborative work with partners at all levels.
- 1.10 The purpose of the Marine Litter Strategy for Scotland is to drive forward positive action on tackling marine litter, whether through reducing sources of marine litter and preventing litter reaching the marine environment or through supporting initiatives to remove marine litter.
- 1.11 The implementation and monitoring of the Strategy will continue to be led by Marine Scotland, in a co-ordinating role. It is recognised that responsibility for delivery, however, is shared across local and national government, business, environmental and community groups, and the public.
- 1.12 The vision for the refreshed Marine Litter Strategy for Scotland is underpinned by five Strategic Directions and a range of actions. Each action has a timeframe, a responsible lead organisation, and a tangible output that can be measured. This is so that Marine Scotland can monitor and demonstrate progress, and to ensure transparency and accountability.
- 1.13 [Appendix A](#) provides further details of the Strategic Directions and planned actions.

This Public Consultation

- 1.14 The purpose of this public consultation was not to repeat the earlier engagement process progressed by the Marine Litter Strategy Steering Group. Rather, it sought feedback on the draft refreshed Strategy and on the range of new actions that have been identified as priorities to guide Marine Scotland's work up to 2027.
- 1.15 The consultation and analysis of responses will ensure the right final approach, and findings will be used by Marine Scotland to undertake any amendments deemed necessary to finalise the Marine Litter Strategy for Scotland prior to its publication later in 2022.

Other Relevant Strategies and Public Consultations

- 1.16 The National Litter and Flytipping Strategy is the terrestrial litter strategy for Scotland. The majority of litter in the sea has originated from land, and as such the terrestrial strategy and action plan will directly impact on marine litter levels.
- 1.17 A [Consultation on the National Litter and Flytipping Strategy](#) closed on the 31 March 2022, and independent analysis of responses to that consultation will be used to finalise the National Litter and Flytipping Strategy prior to its publication later in 2022.
- 1.18 The existence of these two parallel strategies, and the simultaneous consultation that was conducted, is intended to capture all high priority aspects of terrestrial and marine litter. Points raised through the refreshed Marine Litter Strategy for Scotland consultation relating to terrestrial litter have been incorporated specifically at **Section 3** and have been shared with the relevant department to enable consideration whilst the National Litter and Flytipping Strategy is finalised. Similarly, points raised through the National Litter and Flytipping Strategy consultation relating to marine litter will be considered, along with all other responses received, whilst the Marine Litter Strategy for Scotland is finalised.
- 1.19 There were few comments related to marine litter raised in the National Litter and Flytipping Strategy. The following, however, was noted in the consultation analysis report produced by Pye Tait Consulting for the Scottish Government:

“Several respondents, mainly organisations, comment on the need to have a consistent national approach to organising, recycling, and disposing of general household waste. Some state that flytipping and littering strategies should look at the bigger picture including packaging, and marine litter”.

- 1.20 Wider information provided by Pye Tait Consulting is as follows:

“Around 20 respondents suggest that marine litter and terrestrial litter strategies are integrated and their databases connected so that both marine and terrestrial litter can be recorded, analysed and dealt with accordingly, and best practices shared and supported. A similar number comment how the marine environment is only just beginning to be recognised for the amount of litter that is damaging wildlife, and that this should be included in the single information point, and/or be part of any community focussed litter education programme. Additionally, respondents suggest that the protection of marine wildlife should be included in research, and in promotional and education campaigns concerning littering and flytipping. One respondent advocates for more investigation into marine litter and responsibilities in relation to areas not under local authority control”.

Report Structure

1.21 The remainder of the report is structured as follows:

- [Section 2](#) provides details of the consultation methodology.
- [Section 3](#) covers Strategic Direction 1 (Questions 1 and 2).
- [Section 4](#) covers Strategic Direction 2 (Questions 3 and 4).
- [Section 5](#) covers Strategic Direction 3 (Questions 5 and 6).
- [Section 6](#) covers Strategic Direction 4 (Questions 7 and 8).
- [Section 7](#) covers Strategic Direction 5 (Questions 9 and 10).
- [Section 8](#) covers final points raised through the consultation (Question 11).
- [Section 9](#) provides responses to the Business and Regulatory Impact Assessment (Question 12).

1.22 The following appendices have also been attached:

- [Appendix A](#) lists the planned actions that sit under each Strategic Direction.
- [Appendix B](#) provides the frequency tables for all the consultation questions.
- [Appendix C](#) provides a summary of potential campaign responses.
- [Appendix D](#) provides a classification by organisation type for those organisations that responded to the consultation.
- [Appendix E](#) provides details of respondents' wishes regarding the publication (or otherwise) of their consultation response.
- [Appendix F](#) presents details of respondent satisfaction with the consultation.
- [Appendix G](#) provides a high-level response from Marine Scotland regarding how they will respond to the comments received.

2. Consultation Approach and Responses

Consultation Process

- 2.1 The Scottish Government promoted an online public consultation on the refreshed Marine Litter Strategy for Scotland on its Consultation Hub website (Citizen Space). The consultation ran from 29 December 2021 to 22 March 2022.
- 2.2 A vast majority of consultation responses were submitted through the online portal, with the remainder submitted to the Scottish Government directly, for example, by email. Where this was the case, the Scottish Government passed all correspondence directly to EKOS for review and logging.
- 2.3 EKOS exported consultation responses from Citizen Space into Microsoft Excel and manually added non-Citizen Space responses for data cleaning, review and analysis.
- 2.4 A total of **220 responses** were received (all valid e.g. no duplicates or blank responses), a majority of which were submitted by individuals (75.5%), **Table 1**.

Table 1: Profile of respondents

Respondent	Number	%
Individual	166	75.5%
Organisation	54	24.5%

N=220.

- 2.5 A wide range of organisations responded to the consultation, and they have been categorised as follows, **Table 2** and **Table 3**. Key points to note include:
 - Voluntary or third sector organisations are the most common type of organisation (44.4% of all organisation responses), followed by umbrella or membership bodies (27.7%).
 - Organisations' areas of interest are wide, and most commonly focus on an industry perspective (35.1% of all organisation responses), followed by environment and conservation, including those with a specific focus on the marine environment (22.2%).

Table 2: Profile of organisation respondents – organisation type

Respondent	Number	%
Voluntary/third sector	24	44.4%
Membership body	15	27.8%
Private sector	8	14.9%
Public sector	7	12.9%

N=54. EKOS coding in discussion with Marine Scotland.

Table 3: Profile of organisation respondents – area of focus/perspective

Respondent	Number	%
Industry	19	35.1%
Environment and conservation	12	22.2%
Coastal development and conservation	8	14.9%
Other	8	14.9%
Communities	7	12.9%

N=54. EKOS coding in discussion with Marine Scotland.

- 2.6 [Appendix D](#) provides details of how organisation respondents have been categorised.

Analysis

- 2.7 The analysis seeks to identify the most common themes and issues. It does not report on every single point raised in the consultation responses. All responses, where the respondent has given permission for their comments to be published, will be made available on the Citizen Space website.
- 2.8 Equal weighting has been given to all responses. This includes the spectrum of views, from large organisations with a national or UK remit or membership, to individual's viewpoints.
- 2.9 In reading the consultation analysis report, it is important to note that most respondents reported that the planned actions under the objectives would contribute to the achievement of the Strategic Directions.
- 2.10 All submissions to the consultation will be reviewed separately by Marine Scotland.
- 2.11 This analysis report quotes and paraphrases some of the comments received. However, this does not indicate that these comments will be acted upon or given greater credence than others.

Campaign Responses

- 2.12 [Appendix C](#) provides a summary overview of potential campaign responses to the consultation. This largely centres on the expression of support for Extended Producer Responsibility (EPR) schemes and a ban on wet wipes containing plastic.

Limitations

- 2.13 Respondents to any consultation or survey are self-selecting.
- 2.14 The depth of responses to consultation questions is varied – some respondents provide full and detailed responses, while others provide short or single sentence responses. Not every respondent provided a response to each question, and some submissions (e.g. non-Citizen Space responses) provided wider narrative not aligned under a specific consultation question.
- 2.15 Some, but not all, respondents who provided qualitative responses regarding perceived omissions or gaps in the planned actions provided supplementary evidence in support of the points raised.

- 2.16 There were also various comments regarding a need for SMART (specific, measurable, achievable, realistic, and timely) objectives/actions. It should be noted that the action plan, comprising of SMART actions with timescales, deliverables and named responsible leads, was provided on the same webpage as the Consultation Document as a separate Excel document.
- 2.17 The action plan is limited to new and high priority actions only. These have been written as SMART actions. This format is necessary to be able to demonstrate progress being made. The actions relate to high priority areas, where progress and a tangible outcome can realistically be achieved within the lifecycle of the Strategy (2021-2027) and does not list ongoing or existing actions.
- 2.18 Finally, given the cross-cutting nature of the Strategic Directions, some perceived omissions or gaps identified for a particular Strategic Direction did not always sit comfortably in that Section within the consultation analysis report. Rather, the points often referred to another Strategic Direction, and were taken account of in another Section. For example, terrestrial litter is mentioned throughout the responses to the consultation questions.

3. Strategic Direction 1

Strategic Direction 1: Improve public and business attitudes and behaviours around marine and coastal litter, in co-ordination with the National Litter and Flytipping Strategy.

Context

- 3.1 Research suggests that the majority of marine litter originates from terrestrial sources. Meeting the challenge of addressing marine litter levels will depend on businesses and individuals, whether at sea or ashore, playing their part by recognising and taking responsibility for their own actions.
- 3.2 There are currently a range of initiatives aimed at reducing marine litter, raising awareness of the problem, or changing behaviour.
- 3.3 The refreshed Marine Litter Strategy for Scotland further proposes a range of new actions up to 2027, including for example:
 - A review of enforcement of the terrestrial littering and flytipping regulations.
 - The development of a waste management system to improve recycling routes for end-of-life fishing gear.

Question 1: To what extent do you agree or disagree that the planned actions under each objective will contribute to the achievement of Strategic Direction 1?

- 3.4 **Table B1 to Table B4** ([Appendix B](#)) provides the frequency tables to **Question 1**.
- 3.5 The vast majority of respondents (individuals and organisations) agreed (i.e. either agreed or strongly agreed) that the planned actions under each of the four objectives would contribute to the achievement of Strategic Direction 1:
 - Encourage positive behaviour and deter littering and flytipping (85.5%).
 - Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear (86.9%).
 - Improve waste management for collected marine litter (87.4%).
 - Reduce sewage related debris (SRD) through a behavioural change campaign (84.6%).
- 3.6 While in agreement overall, organisations with a focus on the issues of coastal development and conservation, or communities, expressed the highest levels of disagreement (note: absolute numbers are small).

Question 2: Do you consider there to be any omissions or gaps in the planned actions identified under Strategic Direction 1 in the Consultation Document that could help to contribute towards its achievement?

3.7 More than half of respondents considered there to be omissions or gaps in the planned actions identified under Strategic Direction 1 (57.4%), **Table B5**.

3.8 More specifically, organisations were more likely to report that there were omissions or gaps compared to individuals.

Omissions or Gaps Identified

3.9 The wider qualitative feedback has been grouped under each of the four objectives identified for Strategic Direction 1.

Encourage positive behaviour and deter littering and flytipping

3.10 The action under this objective is 'in co-ordination with the National Litter and Flytipping Strategy delivery team, strengthen the enforcement of litter and flytipping regulations'.

3.11 Around one-quarter of respondents who identified omissions or gaps in Strategic Direction 1 provided qualitative feedback on this action, mostly individuals.

3.12 The main issues identified were as follow:

- The most common response was that there needs to be a greater level of enforcement of existing regulations to prevent littering, flytipping and irresponsible waste disposal.
- Various suggestions were made to aid increased enforcement, namely:
 - Increase funding to enforcement agencies.
 - More active patrols of flytipping hotspots.
 - Increase the severity of punishment e.g. higher fines.
 - Target enforcement at the sources of problem litter e.g. fast-food retailers, cigarette butts and single use plastic items.
- Some respondents emphasised the need to incentivise responsible waste disposal, both by making it easier to dispose of litter and offering financial incentives.
- Some hold the view that public awareness campaigns have been limited in their overall effectiveness and that there is scope for improvement in such campaigns to encourage lasting behaviour change.

- There were a few comments which focus on the need for more technological solutions, and specifically the tagging and tracking of litter so that it can be traced back to the source for enforcement purposes.
- There were various comments advocating for an EPR scheme. Such schemes oblige producers to bear responsibility for the environmental impacts of products they place on the market and are incentivised to reduce these impacts (i.e. considering the whole lifecycle of a product; encouraging reuse, repair and remanufacture; and addressing the costs of recycling and disposal).

3.13 The following quotes illustrate the range of views expressed:

“Local Authority funding is being depleted, without additional resources available to them they cannot successfully deter littering at local level, funding needs to be provided for community safety teams or equivalent personnel, to issue fines, and fines associated with littering need to be far greater than currently and action taken against those who do not pay.”

ONUS SWSCOTLAND

“We think the gap here relates to engagement from business. If you apply the principle of producer responsibility and make businesses more accountable for the litter for which they are a primary source (such as fast food/takeaway establishments) then they may be incentivised to run their own public awareness campaigns and to invest to provide extra/better disposal facilities for litter that comes from their business.”

KIMO UK

“Illegal fly tipping has become a lucrative criminal activity, made worse by the cost and extra effort required for correct disposal. Behavioural change will therefore be difficult, but we could make correct disposal easier, and provide incentives to do so.”

Individual

“There needs to be more strongly worded approach to the behaviour of industry, including the fishing and offshore oil industries. They must be made to take responsibility for the damage done and penalised heavily if they fail to do so.”

Individual

“Littering and fly-tipping is increasing because companies are pushing ever more single-use/unnecessary produce on consumers, along with excessive packaging. Until this is curbed by penalising companies financially e.g. via EPR, it will not get better.”

Friends of Dumbarton Foreshore

Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear

- 3.14 Approximately one-quarter of respondents who identified omissions or gaps in Strategic Direction 1 provided qualitative feedback on the objective to ‘improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear’.
- 3.15 The main point raised was not related to any specific action – rather it was a more general point on the evidence presented in the Consultation Document. More specifically, some respondents disagreed that most marine litter originates from terrestrial sources. For example, some respondents based in island communities, largely those organisations with a focus on the issues of coastal development and conservation, or communities, reported that most marine litter in their localities stems from the fishing and aquaculture sectors.
- 3.16 A related point put forward was that the composition of waste in rural and island communities is different from that in other areas – it is said to contain far more waste from the fishing and aquaculture sector.

- 3.17 A quote outlining some of these concerns includes the following:

“In April 2021, following a marine litter networking and learning exchange event, Scottish Islands Federation (SIF), working with the groups and individuals that took part in the event, set up an Island Marine Litter Working Group. This Group is made of island representatives from across the islands – Shetland, Orkney, Bute, Outer Hebrides, Eigg, Raasay, Skye, Tiree, Gigha, Islay and Arran - and all are active in marine litter and island beach cleaning.

In the experience of the Working Group, and its wider network of island marine litter groups, with the exception of islands in North Ayrshire, marine litter collections comprising 70-90% of waste from the fishing or aquaculture industry is the norm, and therefore, while we very much support the national Marine Litter Strategy, the situation on the ground in islands feels at odds with point 4.4. in the introduction to Strategic Direction 1 which states, “research suggests that the majority of marine litter originates from terrestrial sources”.

Scottish Islands Federation

- 3.18 There was also considered to be a lack of financial and other support available for the voluntary sector and others that support and undertake litter removal initiatives. This was said to limit their ability to tackle the issue.
- 3.19 Under the specific planned action to ‘develop a waste management scheme that assures improved management of end-of-life fishing gear’ there were several comments which support the need for actions to increase the recycling of fishing and aquaculture gear, primarily through encouraging the fishing and aquaculture sectors to do more in this area and making it easier to recycle gear.
- 3.20 It was also considered important that action is taken to help prevent the loss of gear at sea. Responses advocated the use of best practice for the design, storage, and use of fisheries and aquaculture gear.

- 3.21 Related to this, a number of respondents noted that the focus on end-of-life fishing gear overlooks the dumping or loss of non-end-of-life gear and other single use plastics (e.g. bottles, etc) that come from fishing boats.
- 3.22 There were a small number of comments from various organisation groupings that felt that there is an overemphasis in the Strategy on waste from the fishing sector and too little a focus on waste from the aquaculture industry, which some said made up a considerable portion of collected waste on beaches.
- 3.23 It was highlighted that aquaculture sites have established waste management plans that ensure end-of-life materials are disposed in a way that is compliant with legal requirements and that these are monitored through regular internal and external audits.
- 3.24 Quotes illustrating these issues are provided below:

“We would also recommend, as part of the work to develop this waste management scheme, an extra focus on preventing gear being lost in the first place. This may also tie into the circularity work in action 2 on the CEN standard. Best Practice Guidelines to ensure Fisheries and Aquaculture gear is designed, stored and used need to reduce the risk of loss into the marine environment. Support for the industry must be provided as part of this work to ensure suitable measures or incentives are in place so a reliance on clean-up is not create”.

Marine Conservation Society

“It is important to establish IMMEDIATE measures to ensure that ghost fishing gear waste can be appropriately disposed of NOW. Not in 2 -5 years’ time when new systems have been developed to recycle it. Volunteers have lifted around 8 Tonnes from the beaches between Monifieth and Arbroath since April 2019. Angus Council have to pay another Local Authority to send it to landfill as we no longer have a landfill in Angus and it can't go to 'Waste to Energy'.”

East Haven Together (EHT) and Angus Clean Environments (ACE)

“The rubbish found on our beaches is often not 'end-of-life', but discarded (perhaps through accident) but with no effort to recover it. We have witnessed the carefree attitude with which equipment is discarded, not only causing pollution but a marine hazard to vessels and marine mammals, while it is afloat at sea.”

Skye Tide Tidelines

“Although the long-term aspiration is to have capability for processing marine litter in Scotland, we would like to see existing facilities enabled to take plastics collected and taken off the coast. We understand the difficulties with fishing nets clogging machines but the ability is there to reprocess plastics but the lack of demand for the hard plastics collected (and the contamination/quality) means that anything being picked up is likely to be landfilled or shredded for fuel rather than recycled.”

Solway Firth Partnership

- 3.25 The planned action to ‘work with the European Committee for Standardisation (CEN) to develop a standard for the circular design of fishing gear to facilitate better waste management and reduce environmental impact’ attracted a few comments. There was broad agreement that fishing gear needs to be made of more easily recyclable material.
- 3.26 The Scottish Environment Protection Agency (SEPA) proposed some additions to the Strategy in this area around developing innovative fish farming systems which capture and make use of waste products, including single use plastics and other marine litter. SEPA further noted that they are currently working with industry to drive innovation in this area.
- 3.27 Further, the Scottish Fisherman’s Federation highlighted that any circular design of fishing gear could only work if newly designed nets can catch fish in a sustainable and profitable way.

3.28 Quotes illustrating these points included the following:

“Work required with manufacturers regarding fishing gear waste, nets/rope etc. Apparently, it’s made from various mixes of polymers not easily or financially viable to recycle. So they need to be made from recycled materials and be recyclable at end of life and it’s needs to financially viable. The producers of goods need to take responsibility for the waste disposal of them it should not be up to the purchaser/consumer”.

ONUS SWSCOTLAND

“There is one company in the EU, based in Denmark, that recycles polyolefin ropes and nets; the kind used by most Scottish fishermen, fish farms and the shipping industry. To ship plastic abroad from Scotland to Denmark is prohibitive both in cost and environmental footprint....Has the Scottish Government considered incentives to recycle polyolefin ropes and nets here?”.

Plastic@Bay

- 3.29 There were relatively few comments concerning the planned action to ‘extend access to Port Waste Reception Facilities to fishing vessels’.
- 3.30 A key point raised was that there is considered to be a lack of recycling/disposal facilities at Scottish ports, particularly at smaller ports in more isolated locations.
- 3.31 The Scottish Fishermen's Federation also noted concern regarding additional costs that may be imposed on fishing vessels, particularly with regards to Port Waste Reception facilities. The Federation felt that keeping facilities low cost could greatly enhance the chances of fishermen using them.

Improve waste management for collected marine litter

- 3.32 Relatively few consultation responses made explicit reference to the planned action that sits under this objective, namely to ‘explore the potential to support the waste sector to consider recycling opportunities for degraded and contaminated marine plastics, including fishing gear’.

3.33 Much of the wider commentary, as noted above and below, focused on stopping marine litter at source.

3.34 The two main points raised were as follows:

- Crown Estate Scotland reported that there were limited facilities for the recycling of fishing and aquaculture gear in Scotland and most material must be exported or sent to landfill. They supported improving facilities for reusing/recycling this material.
- It was noted that there were currently no UK based companies that specialised in disposal of these materials and they have to be shipped to the EU for processing. A point raised was that industry has difficulty in disposing of end-of-life gear in an environmentally sustainable manner and there could be a commitment in the Strategy to establishing the required infrastructure for the processing of this waste.

Reduce sewage-related debris (SRD) through a behavioural change campaign

3.35 The action under this objective, namely to ‘develop, launch and run an awareness raising campaign to promote behaviour change and highlight inappropriate flushing of wet wipes and sanitary items containing plastics down the toilet’, attracted a high level of feedback.

3.36 On the one hand, organisation respondents including SEPA and Crown Estate Scotland, among others, were all broadly supportive of the planned public awareness raising campaign, with some noting a willingness to collaborate with Marine Scotland on this.

3.37 Quotes illustrating this point included:

“Scottish Water recently launched our new ‘Nature Calls’ campaign and we will work with Marine Scotland to update Strategic Direction 1.”

Scottish Water

“SEPA would add: SEPA is working with Scottish Water to support source control for inappropriately flushed items as part of the Improving Urban Waters Route Map and is amplifying communications surrounding Scottish Water’s Nature Calls campaign.

Scottish Water’s Route Map for Improving Urban Waters has the following actions for this:

- Support the Scottish Government to develop proposals to ban single use plastic products, such as wet wipes, and to improve labelling to promote correct disposal.
- Develop and roll out a campaign to educate customers to reduce instances of flushing items which impact the sewerage system.

- Continue to support UK-wide and create new Scottish initiatives to reduce retail and consumer access to products that are inappropriately flushed to help reduce disposal of these items to the sewer.”

SEPA

3.38 On the other hand, a more common response from individuals expressed scepticism at the efficacy of the planned behavioural change and awareness raising campaign, and noted that it would need to be much better than previous campaigns to have any significant and lasting effect.

3.39 Many respondents (e.g. largely individuals, including a campaign response) felt that wet wipes and/or other single use plastic items should be banned or reformulated, rather than relying on public awareness raising.

3.40 The main points raised by this cohort of respondents can be summarised as follows:

- There was acknowledgement across the responses that wet wipes are a significant contributor to marine litter. Some want a complete ban on wet wipes, while others felt that it should only be wet wipes containing plastic.
- Some go further and express support for a wider ban on single use plastic items altogether.
- A common view expressed was that awareness raising and enforcement alone may be insufficient to reduce wet wipes and plastic pollution, and that a ban may be the most effective solution.

3.41 The following quotes help to illustrate the range of views provided:

“Ban the sale of wet wipes containing plastic in Scotland.”

Individual

“Reduce the amount of plastic and non-biodegradable waste occurring in the first place. If not possible to ban products which are single use and easily discarded badly, heavily tax them. I think trying to change behaviours of the lazy will never succeed, but if the waste thrown / discarded / flushed by them is less harmful or less consumed then discarded efforts will be more effectively targeted to solving the problem of harmful waste products in the sea.”

Individual

“Change the requirements for sanitary, baby materials wipes etc to make mandatory these items to be made of 100% biodegradable materials as soon as possible.”

Individual

“We need to ban single use plastic wipes. 25 wipes per 100m of beach are found during litter picks on Scottish beaches...As well as this, companies

who have created this pollution problem should be made to pay for clean-up operations by law.”

Individual

3.42 Some industry respondents raised concern about the wider implications of any potential bans or reformulations of wet wipes. The main points raised in the consultation responses were as follows:

- There can be confusion among the public between biodegradable and flushable wipes.
- That wet wipes are a diverse product used for a variety of functions, including for consumer purposes (e.g. baby wipes, household wipes), professional wipes used in hospitals and care settings, and industrial wipes. Here, responses noted that professional and industrial use wet wipes are generally disposed of via a secure waste system and are less likely to contribute to marine litter.
- That many users of wet wipes do dispose of them properly and may be penalised by any ban on wet wipes containing plastic or wet wipes in general.

3.43 The following quotes help to illustrate the range of views provided:

“Berry Global, as a member of EDANA [the international industry association representing the nonwovens and related industries], supports the need for a behavioural change campaign. However, the focus should not be on the composition (i.e., the presence of plastic), but rather the inappropriate flushing of all non-flushable wet wipes (i.e., those wet wipes neither designed nor marketed as flushable) regardless of composition.”

Berry Global

“While there is no place for waste plastic in the environment, it must be acknowledged that many hygiene products, including wipes (irrespective of whether they contain plastic or not) are wrongly disposed of via the toilet. Therefore, Cosmetic, Toiletry & Perfumery Association (CTPA) believes that it is fundamental to inform consumers so that they are encouraged to dispose of wipes correctly. CTPA would suggest the requirement for clear on-pack labelling to advise whether products can be flushed or should be disposed of with household rubbish backed up by a solid, awareness campaign.”

Cosmetic, Toiletry & Perfumery Association (CTPA)

“The terms ‘biodegradable’ and ‘flushable’ are frequently being confused and a switch to biodegradable plastic free wet wipes would not address the underlying problem of inappropriate disposal of the product via the toilet... Consumer education is key, and it is vital to encourage consumers to dispose of wipes correctly.

It will be critical to acknowledge that a ban on plastic containing wipes on its own would not solve the issue of wipes in the environment. Many wipes are incorrectly disposed of via the toilet which in turn can end up in the environment due to storm sewage overflow discharges from sewage plants.

To summarise, we feel that there are two critical components to prevent wet wipes ending up in the environment and these are:

- To stop consumers disposing of wipes incorrectly, regardless of their composition (which could be addressed by consumer education campaigns and on-pack product disposal labelling).
- To stop any unnecessary storm sewage overflow discharges/pollution incidents.

Wet wipes provide convenient and essential cleaning solutions to many consumers, from babies to adults both in the home, in social care situations and on the move. Wet wipes have become essential to today's hygiene practices.”

Nice-Pak International Ltd

4. Strategic Direction 2

Strategic Direction 2: Reduce marine and coastal based sources of litter, with a focus on the most problematic sources, in co-ordination with land sourced litter being reduced by the National Litter and Flytipping Strategy.

Context

4.1 Marine litter stems from two sources, namely land-based and sea-based sources. There needs to be an integrated approach to address marine litter and stop it at source.

4.2 Planned actions within the refreshed Strategy will include, for example:

- A range of policy options to reduce sources of SRD.
- Contributing to the development of an international plastic pellet certification scheme.

Question 3: To what extent do you agree or disagree that the planned actions under each objective will contribute to the achievement of Strategic Direction 2?

4.3 **Table B6 to Table B8** ([Appendix B](#)) provides the frequency tables to **Question 3**.

4.4 The vast majority of respondents (individuals and organisations) were in broad agreement (i.e. either agreed or strongly agreed) that the planned actions under each of the following three objectives would contribute to the achievement of Strategic Direction 2:

- Reduce plastic pellet loss into the marine environment (89.1%).
- Improve the ability of the fishing industry to retrieve lost fishing gear from the sea (82.0%).
- Reduce sources of sewage-related debris (SRD) (86.4%).

4.5 Here, there was strong support expressed for the three objectives under Strategic Direction 2 and related actions. They were considered “very important” issues to tackle, and the focus and “leadership” on reducing marine and coastal based sources of litter, with a focus on the most problematic sources was also “welcomed” and considered “laudable”. These objectives were reported as being a “huge area of concern”.

Question 4: Do you consider there to be any omissions or gaps in the planned actions identified under Strategic Direction 2 in the Consultation Document that could help to contribute towards its achievement?

- 4.6 Just over half of respondents considered there to be omissions or gaps in the planned actions identified under Strategic Direction 2 (52.6%), **Table B9**.
- 4.7 Organisations were more likely to report that there were omissions or gaps compared to individuals, in particular those with a focus on issues such as coastal development and conservation, or environment and conservation.
- 4.8 The objective to 'reduce sources of SRD' attracted most feedback.

Omissions or Gaps Identified

- 4.9 The wider qualitative feedback has been grouped under each of the three objectives identified for Strategic Direction 2.

Reduce plastic pellet loss into the marine environment

- 4.10 Around one-quarter of respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 2 commented further on the objective to 'reduce plastic pellet loss into the marine environment'.
- 4.11 The main groups of respondents who commented on plastic pellets included individuals and those organisations with a role/interest in coastal development and conservation, or environment and conservation.
- 4.12 The main points raised have been grouped and can be summarised as follows:
- There was said to be no reference in the planned actions to issuing fines or prosecuting companies responsible for any unplanned loss that allows plastic pellets, flakes and powders to get into the marine environment. It was felt that this could "force change" and improve the design of more environmentally friendly products, improve containment and management of these products, and lead to more effective control across the supply chain.
 - There was felt to be a wider need to reduce the overall production and use of plastic, microplastics, and single use plastic items. It was reported that action on this front could ultimately lead to a reduction of plastic pellets being released into the marine environment in the first place.
 - Actions that support increased research into more environmentally friendly alternatives and materials to plastic were supported, as were the increased promotion and use of such alternatives.

- The British Standards Institution (BSI) Publicly Available Specification (PAS) standard on plastic pellets was broadly said by respondents to be a “good initiative”. There was wider feedback that consideration could be given to the introduction of a legislative framework to support the adoption of the BSI PAS standard as part of a supply chain approach. Related points suggested that the action relating to the BSI PAS standard could be further strengthened with firmer and more specific targets and timescales and the inclusion of a requirement for industry to clean up existing pellet pollution in the short-term as well as reducing future pollution.
- There was support for the inclusion of additional actions that support the monitoring of plastic pellet loss. It was considered that such activity might fit best within Strategic Direction 4 and could ultimately support the actions identified within Strategic Direction 2 to reduce plastic pellet loss into the marine environment.

4.13 The following quotes help to further illustrate the range of views provided:

“Companies involved in plastic production must be fully accountable for the pollution they create and be actively involved in cleaning up the spills.”

Individual

“We need.....compliance and investigative monitoring. The former would provide evidence of the effectiveness of implemented measures and would need to include upstream sampling as well as sampling in the marine environment. Investigative monitoring is needed to understand specific point sources e.g. from sewage waste-water discharge or particular factories or industrial sites. This would ensure that measures implemented are monitored for effectiveness, highlighting where measures are insufficient or lacking.”

Marine Conservation Society

“We would also welcome the inclusion of actions to ensure pellets are addressed through other regulation and legislation such as UK REACH and Scottish Government’s Circular Economy Bill. We support efforts to ensure certification schemes are being developed in line with the OSPAR guidelines, however, it should be noted that the certification schemes currently in development are not global in scope and other measures are likely to be required, such as the development of an ISO. This would help ensure that pellets made in Scotland, traded in Scotland and plastic products sold in Scotland have not contributed to pellet loss.”

Fidra

“...our unsustainable consumption of single use items, for example plastic packaging and wet wipes, is driving up the level of marine litter. We are aware of new legislation coming into force in June 2022 to address single use plastics....Measures to incentivise circular economy practices in design would be welcomed...This could include for example, supporting the implementation of innovations in the re-design of existing products and the design of new products, and supporting innovations and start-ups, in particular those related to new, biodegradable and compostable plastics....Innovative facilities to enable more recycling of waste plastics should also be supported”.

Crown Estate Scotland

Improve the ability of the fishing industry to retrieve lost fishing gear from the sea

- 4.14 Similarly, around one-quarter of respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 2 provided commentary on the objective to ‘improve the ability of the fishing industry to retrieve lost fishing gear from the sea’.
- 4.15 The main groups of respondents who commented on actions relating to retrieving lost fishing gear included individuals, organisations with an interest in the environment and conservation, and the fishing industry.
- 4.16 The main points raised can be summarised as follows:
- The term “lost” fishing gear was referenced at times, with feedback that there is a much wider problem relating to the “deliberate” or “intentional” discard of litter at sea, including (“substandard”) fishing gear. Here, it was considered important that a range of preventative measures were put in place to tackle this issue.
 - Another viewpoint expressed was that consideration could be given to imposing penalties for gear discarded/a legal impetus on these boats to oblige them to at least attempt retrieval of lost fishing gear. Further, it was noted that identification of the discarder would need to be easier both from an accountability and enforcement perspective.
 - Related points included that achievement of the objective to help ‘improve the ability of the fishing industry to retrieve lost fishing gear from the sea’ would be heavily reliant on the ability and willingness of the fishing community to spend time and resources on retrieval. Here, there was wide feedback across responses on the range of challenges and external factors at play:
 - Challenges – for example, lost fishing gear that is: difficult to recover; costly to recover; difficult to dispose of safely onshore; difficult to reuse even if it is recovered; or considered to be of low or no value.

- External factors – fishing gear that is lost because of weather and environmental issues (e.g. storms) and therefore difficult to find and reuse; or it is also noted retrieval of lost gear, or gear lost at sea/to the sea is less common in the aquaculture industry and can occur in the event of a failure of site infrastructure.
- A variety of suggestions were proposed within the responses to the objective to help ‘improve the ability of the fishing industry to retrieve lost fishing gear from the sea’. This included, for example, introducing: a deposit return scheme; a payment for fishing gear returned for recycling; a scrappage incentive; a licensing scheme for fishing nets; requiring fishing vessels to have a satellite tag on nets/fishing gear that contain plastic (plastic inventory and registered to those vessels); and providing recycling facilities at harbours that are free and easy to access.
- There was wider reference within the consultation responses to the wording of the planned action to ‘give support to the development or trials of new tools or technologies that could be of use to the Scottish fishing industry, in order to achieve successful retrieval of lost fishing gear’. It was reported that this action could be extended to include industries other than the Scottish fishing industry. Common feedback was that “the aquaculture and shipping industries are significant sources of plastic pollution and must not be overlooked”. In a similar vein, there was reference to the importance of reducing marine litter arising from any military activity happening in the marine environment.
- It was proposed that Strategic Direction 2 could include actions that support education and awareness raising on the issue of lost fishing gear and the hazards/dangers it causes to the marine environment.

4.17 The following quotes help to further illustrate the range of views provided:

“Measures to prevent the intentional discard of litter (including fishing gear) at sea.....could take the form either of enforced land-based monitoring of gear (i.e. a check of what went out to sea vs what came back, or measures to determine the amount of waste expected to be generated per person at sea, which then needs to be accounted for on return), or of better monitoring of activity at sea, to tie in with monitoring focused on preventing over-fishing and discard, fishing of inappropriate species, and other activities currently taking place at sea with no ability to monitor or enforce.”

Individual

“Government-backed trials of new technology to help fishing crews recover lost fishing gear would be welcome. However, this action seems to have been limited to Scottish vessels only”.

Shetland Fishermen's Association

“The difficulty is understanding 'circular design'. Increasingly fishing gear has become more resilient to marine environment to last longer, etc hence it is difficult to reuse. Also weather and environmental issues such as recent storms where masses of gear are lost to weather and difficulty in finding let alone reuse”.

Individual

4.18 Wider points raised in relation to the objective to ‘improve the ability of the fishing industry to retrieve lost fishing gear from the sea’, albeit not to any great extent include, for example:

- Consideration could be given by Marine Scotland to the inclusion of actions that encourage and incentivise the use of alternative materials in fishing gear and/or actively discourage or prohibit the use of non-biodegradable plastic materials (e.g. material that photodegrades into small fibres and micro plastic) as part of a wider ban on non-biodegradable plastic materials.
- It is important to seek advice from relevant charities with knowledge, experience and expertise in this area to finalise the actions. For example, Greenpeace, Whale and Dolphin Conservation, and marine conservation groups, are all mentioned as examples.

Reduce sources of sewage-related debris (SRD)

4.19 The objective to ‘reduce sources of sewage related debris (SRD)’ attracted most feedback from respondents. Over 40% of respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 2 provided commentary on this objective.

4.20 The main groups of respondents who commented on actions relating to SRD included individuals, and organisations with a focus on the issue of environment and conservation. Industry also commented on the planned actions.

4.21 The planned action to ‘investigate the potential for legislation to ban the manufacture and sale of wet wipes containing plastic, with a requirement that any alternatives meet the 'Fine to Flush' standard’ attracted much feedback.

4.22 The main themes that emerged relating to this action can be summarised as follows:

- There was support for actions that promote long-lasting behaviour change and/or support for improved and clear product labelling to promote correct disposal. It was considered vital that the refreshed Marine Litter Strategy for Scotland continues to: raise awareness, educate and support consumers and others about the environmental damage caused by SRD; encourage consumers to dispose of used wet wipes correctly/appropriately; and/or support consumers “to move to reusable products” as part of the ambition to move to a circular economy.

- Sitting alongside behaviour change actions, there was also said to be a need for actions that encourage better control of pollution incidents and sewage overflow discharges from sewage treatment plants to prevent wet wipes that are not designed or marketed as flushable ending up in the environment in the first place. It was noted that planned actions could go further to significantly reduce the number of wet wipes entering the sewage system.
- There was reference to other products that end up in the marine environment due to incorrect disposal via the toilet (e.g. sanitary products, toilet fresheners, plastic tooth floss sticks, condoms) that also need addressed by the Strategy. Aligned to this was a suggestion that applying EPR to all sanitary products (not just those that contain plastic) to cover clean-up costs could also be considered.

4.23 Further, there were a mix of views expressed across the consultation responses relating to a suggestion for a mandatory standard and a blanket ban regarding the manufacture and sale of wet wipes containing plastic.

4.24 There was commentary provided, primarily from individuals and most sub-categories of organisation respondents (i.e. all except industry), regarding both the language and timescale of this planned action.

4.25 A summary of points raised have been summarised below:

- The phrasing of the action was considered by these respondents to be “too tentative” or “too weak” and that it could benefit from being more “strongly worded” or that there is scope to “tighten the language”.
- The proposed timeframe for the action (i.e. medium to long-term) was considered not urgent or quick enough. There was also some feedback that the ban should have immediate effect.
- Supporting points raised included that: there was sufficient and “clear evidence” to ban the manufacture and sale of wet wipes containing plastic (and to ban all avoidable single-use plastic in other sanitary items, such as tampon applicators, where alternatives exist); a ban on such products was felt to be “long overdue”; and/or that “alternative materials should become the norm”.
- Regarding implementing a ban on the manufacture and sale of wet wipes containing plastic, there was feedback that this should not simply be substituted with “another single-use material” and that manufacturers could be “mandated to move to environmentally friendly alternatives” within a reasonable timescale.

“We welcome Marine Conservation Society’s proposal to tighten the language of the ‘Reduce Sources of SRD Action 1’ with regard to ‘Fine to Flush’, but would reiterate that, whilst the ‘fine to flush’ standard was developed to address accessibility and quality of life, the concept of wipes that are fine to flush are not compatible with the circular economy, and that there exists potential for additional chemicals to enter the wastewater system which may end up in unintended settings. Therefore, we back Scottish Water’s campaign (mentioned within Strategic Direction 1) that calls for all wipes to be binned, and that those containing plastic to be banned”.

Keep Scotland Beautiful

4.26 Industry respondents (e.g. companies involved in the manufacture of wet wipes and related industries), while supportive of “minimising or even avoiding pollution from wet wipes that are inappropriately disposed off”, or supportive of having “an ambition to ultimately become plastic-free”, emphasised wider complexities relating to the implementation of this action.

4.27 A variety of points were raised by these respondents, including the following:

- That it was important to note the diversity of wet wipes on the market and that there should be a “distinction made between wet wipes for domestic or personal care, and ‘professional wet wipes’ used in business, industry, education and healthcare settings”.
- That professional wet wipes should be exempt from any potential future ban on plastic in wet wipes given the “vital role they play in effective prevention and control strategies”. Further, it was noted that a blanket ban could result in “less effective products being used in these professional environments, where waste disposal is already well managed, increasing the potential for viruses and pathogens to spread”. Additionally, a ban on plastic in professional wipes could significantly increase product cost for end users.
- That there was a distinction between wet wipes (i.e. domestic and professional) is already made in the European Union (EU) [Single Use Plastics Directive](#) (2019/904) – it was proposed that any future legislation in Scotland should similarly distinguish between personal care and professional products.
- It was noted that non-flushable wet wipes, which represent most wet wipes in the marketplace, were not designed to be flushable and disposing of them down the toilet would not be appropriate for a variety of reasons and should be disposed in an appropriate bin. For example, where the strength of the wet wipe is needed for tough cleaning, where a larger wet wipe size is required for its intended purpose, or where the ingredients used on the wet wipes may be unsuitable for disposal via the aquatic environment. These can include: consumer products such as baby wipes, personal care and household wipes; professional wipes such as wipes used in hospitals and the community for medical or cleaning/disinfecting purposes; and industrial wipes.

- Not all wet wipes are composed of plastic materials or synthetic polymers. Some wet wipes contain natural polymers such as cotton, viscose, lyocell and wood pulp. Some wipes are blends of synthetic and natural polymers. “While the industry is using more natural polymers, plastic materials cannot be phased out completely, this depends on the type of wipe and the purpose for which it is used”. Further work (and time) would be needed to “develop satisfactory alternatives that are effective and not prohibitively expensive” e.g. for products used for infection prevention.
- One example of “a possible path forward is the action taken by the EU with its Single Use Plastics Directive (SUP) (2019/904). The legislation imposes clear marking requirements on plastic-containing wet wipes, inspired by the existing voluntary industry code of practice”. Beyond the voluntary code of practice, it was noted that many EDANA member companies have launched wipes packaging in the UK with these new markings. To preserve the free movement of goods, EDANA and Absorbent Hygiene Product Manufacturers Association (AHPMA) suggested allowing this marking system to be recognised in the UK as well.

4.28 Where mentioned (e.g. by industry), support was expressed for the action ‘taking an evidence-based approach, consider a range of policy options to reduce sources of sewage related debris’. This was considered by these respondents as a sensible and appropriate approach.

4.29 Further, SEPA noted that their approach to improving urban waters has been set out in Scottish Water’s [Urban Waters Routemap Supports National Action Plan](#) (2021). This highlights the need for “a step change in our efforts to tackle the most significant environmental impacts, including litter, as soon as possible and to take a One Planet Prosperity approach to improving our water environment for the long term”. SEPA acknowledged that “actions and resources are required not only by Scottish Water but by many other stakeholders, including SEPA, Scottish Government, local authorities and customers, if we are to deliver a circular economy approach for urban water management in Scotland”. SEPA highlighted that “there are a number of issues relevant to sewage discharges which have emerged in recent years, such as microplastics, antimicrobial resistance, and an increase in wild swimming”.

4.30 These are not considered in the current legislation nor in SEPA’s current regulatory policy, however, SEPA “intend to engage with relevant stakeholders, including Scottish Water and NGOs, to discuss these issues and the long-term plan to progressively eliminate litter and substantially reduce spills”.

4.31 The Routemap was published when the content for the Marine Litter Strategy consultation had been finalised prior to going live. SEPA suggested that it would be helpful if the Marine Litter Strategy and Action Plan could refer to the Routemap which includes actions for Scottish Water to reduce spills as follows (as well as setting out several shorter-term aims to 2024):

- Reduce Combined Sewer Overflows (CSO) spill volumes in the medium and long-term by maximising surface water management opportunities and minimising infiltration.
- Work on a plan to develop and deliver solutions to achieve zero uncontrolled discharges in the longer term.

- CSO spill reduction will help to address an important pathway for the transmission of antimicrobial resistance (AMR) – for example microbes, genes, and chemicals in the environment.
- Support research to understand the impacts of sewer spills on microplastics and AMR in our urban waters.

4.32 Linked to the above point, Scottish Water noted that it would work with Marine Scotland to update Strategic Direction 2.

4.33 There were wider comments on the various planned actions relating to CSOs within the Marine Litter Strategy and Action Plan, with the main points including:

- That more work would be needed to improve the sewer network to reduce the number of sewage spills through CSOs. Some respondents (e.g. individuals, and organisations with an interest in the environment and conservation) noted that “the number of these events has increased...in recent years”, and that “numerous reports to Scottish Water and SEPA” have been made over the years to “highlight the type and volume of sewage debris uplifted”.
- As noted above – it was highlighted that many wet wipes are incorrectly disposed of which can end up in the environment due to storm sewage overflow discharges from sewage plants.
- Understanding/evidencing the impact of SRD and spills on water quality and on wildlife was also considered important.
- There could be greater scope to include actions that aim to involve and engage communities (e.g. studies in relation to SRD monitoring, community science projects, community based Sustainable Drainage Systems (SuDS) projects, and informing and educating the public on how to reduce sewage overflows).
- There was an element of disappointment expressed within some consultation responses regarding the scale of ambition of deliverables referenced in the Action Plan, or a lack of targets was also mentioned.
- SEPA reiterated the importance of this section of the Marine Litter Strategy and Action Plan making reference to relevant actions in Scottish Water’s Routemap for Improving Urban Waters (2021). It referenced the following Routemap actions as being of particular relevance:
 - Install monitoring on network and treatment works CSOs discharging to the highest priority waters (including all designated shellfish and bathing waters), representing approximately 1,000 CSOs.
 - Increase reporting of spill data from monitored CSOs.
 - Continue the prioritisation all CSOs causing SRD problems (currently 630) by reviewing available performance information and undertaking surveys at all CSOs modelled to spill more than once in five years and/or, for monitored CSOs, those exceeding spill frequency triggers.

- Develop solutions for those CSOs that are already confirmed as being high priority having significant SRD impacts on rivers (85 locations).
- Agree delivery timetables for the high priority CSOs (currently estimated to cost around £100m - £130m).
- Identify the next tranche of priority (medium impact) CSOs and agree timescale for solution development.
- Continue to provide a rapid clean-up service to mitigate the visible impact on the environment when CSOs spill and cause SRD problems.

4.34 The following quotes further illustrates some of the points outlined above.

“...there are still a lot of old CSOs along the Tay.... This is only going to get worse unless there is an investment into separating off surface from foul water. Would the screening enable the sewage to be manually removed from the CSOs and brought back to land? Due to the increase in stormy weather it is apparent that SRD can be problematic on our beach for at least nine months of the year”.

East Haven Together (EHT) and Angus Clean Environments (ACE)

“The proposed number of new CSOs recommended for monitoring, along with the proposed new screens for CSOs is extremely low with regard to the number currently known to be causing Sewage Related Debris issues”.

Keep Scotland Beautiful

4.35 Regarding the action to ‘carry out focused aesthetic and feasibility studies to better understand the impact of SRD, and to confirm whether an intermittent discharge is causing aesthetic impacts from SRD pollution and provide indicative solutions to resolve these issues’ a few points were raised in the consultation responses:

- Keep Scotland Beautiful note that it would be important to make the “reports publicly available within a timely manner”.
- SEPA suggest that “This action is covered in the other actions stated above under the Improving Urban Waters Routemap.....Under the Routemap, studies and solution delivery will now be prioritised nationally”.
- East Haven Together (EHT) and Angus Clean Environments (ACE) pose a question around what the studies aim to achieve – and go on to express that the aesthetic impacts from SRD are already known and significant. The voluntary sector groups refer to the Marine Conservation Society which has “extensive and comprehensive data from beaches all over Scotland to highlight the type and amount of SRD. Community volunteers would not pick it up if we thought it did not affect the marine environment either visually or environmentally”.

Wider Points

- 4.36 There were a variety of comments made regarding the need to tackle land-based sources of litter more generally (e.g. tobacco filters/waste, vaping litter, dog fouling, fly-tipping, public bin shortages and overflowing public/roadside bins, etc) as well as land-based litter which ends up in the marine environment from land/wind/non-sewer stream flow (e.g. plastic bottles and other plastic items/packaging; tobacco filters/waste; poor farming practice and lack of buffer strips and the chemical pollutant run off from this that ends up in rivers and seas; and waste that results from agriculture, haulage and construction sectors - sheet plastics/feed bags/bale wrap/pallet wrap, etc).
- 4.37 There were various comments that emphasise that fines or penalties could be considered as a means of holding people and organisations to account, and that effective enforcement was considered a crucial component of this.
- 4.38 Increasing education and awareness of the sources of marine litter was also considered important, as well as how everyone can play their part in preventing/reducing it.

5. Strategic Direction 3

Strategic Direction 3: Support the removal of marine litter from the marine and coastal environment.

Context

- 5.1 Significant action that supports the removal of marine litter from the marine and coastal environment is already underway from a wide variety of organisations. These range from small community groups to national NGOs. Some initiatives have been in existence for many years or decades and play a significant part in Scotland's work to tackle marine litter.
- 5.2 Planned actions within the refreshed Strategy will include, for example:
- An expansion of work to remove litter from rivers, thereby preventing this reaching the marine environment.
 - Improving the efficacy of projects which remove litter from the sea and investigating the potential for an initiative to recycle the material collected.

Question 5: To what extent do you agree or disagree that the planned actions under each objective will contribute to the achievement of Strategic Direction 3?

- 5.3 **Table B10 to Table B13** ([Appendix B](#)) provides the frequency tables to **Question 5**.
- 5.4 The vast majority of respondents (individuals and organisations) agreed (i.e. agreed or strongly agreed) that the planned actions under each of the following four objectives would contribute to the achievement of Strategic Direction 3:
- Reduce the cost of disposal of collected marine litter (84.4%).
 - Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal (91.3%).
 - Expansion of the Fishing for Litter project (89.7%).
 - Installation of riverine litter removal technology in the River Clyde (84.5%).

Question 6: Do you consider there to be any omissions or gaps in the planned actions identified under Strategic Direction 3 in the Consultation Document that could help to contribute towards its achievement?

- 5.5 Views were relatively mixed - approximately one-third (38.0%) of respondents considered there to be omissions or gaps in the planned actions identified under Strategic Direction 3, **Table B14**. A similar proportion were unsure.

5.6 Organisations were more likely to report that there were omissions or gaps compared to individuals, in particular those with a focus on the issues of coastal development and conservation, communities, or environment and conservation.

Omissions or Gaps identified

5.7 The wider qualitative feedback has been grouped under each of the four objectives identified for Strategic Direction 3.

Reduce the cost of disposal of collected marine litter

5.8 The planned action under the objective of 'reduce the cost of disposal of collected marine litter' is to 'explore a mechanism to assist communities to reduce costs in disposing of large volumes of collected beach litter'. This attracted qualitative feedback from around half of respondents who considered there to be omissions or gaps.

5.9 The main groups of respondents who commented on this included organisations with a focus on the issues of coastal development and conservation, communities, or the environment and conservation, as well as from individual respondents.

5.10 The main points raised include:

- It was noted across consultation responses that there could be stronger reference to "beach cleaning", the "volumes of plastic washing ashore on the coast of Scotland" and "the massive amount of work undertaken by local individuals, community groups and NGOs".
- Aligned to the point above, it was proposed by an organisation respondent that beach cleaning could be considered "as a stand-alone objective within this Strategic Direction". Wider feedback from respondents suggested that Marine Scotland could consider "supporting major beach cleaning operations in the most polluted areas" or "target efforts in areas not covered by volunteer schemes, or those too inaccessible to be cleaned without specialist support". Consultation responses highlighted that more work or action was needed to "aid removal on remote and rural mainland beaches" as "many face barriers to marine litter removal due to the amount of litter and the logistics of removing it from the beach and transporting it to a waste facility". Such activity was also said to "create a disproportionate cost" in these communities.
- Litter picks in Scottish towns and cities ("urban beach cleans"), were said to play an important role in helping prevent litter from reaching the sea in the first place. Further, beach cleaning operations in the most polluted areas could also help "complement the prevention of pollution entering the ocean via the river project in the Clyde and joining the KIMO 'Fishing for Litter' scheme". In cities where communal rubbish bins are in use on the street, it was felt that these should be secure and emptied frequently to prevent wind blowing rubbish onto the streets.

- The significant reliance on the “goodwill of volunteers to remediate ocean plastic pollution generated on land and at sea” was commonly highlighted in consultation responses. A suggestion was that “professional surveying and cleaning by trained personnel is required to fully grasp the intensity of the pollution”, and that it was important to not rely on volunteer efforts alone.
- The planned action’s key deliverable i.e. to provide ‘information to assist relevant parties (e.g. community groups, NGOs) to dispose of large volumes of beach litter without prohibitive financial costs’ also drew feedback from respondents, namely that on its own the objective of reducing the cost of disposal of collected marine litter could be difficult to achieve. The main points raised were that:
 - The deliverable appeared to focus on the provision of information only and did not provide any wider “commitment of human resources (paid staff)” to support overall achievement of the objective. This could result in increased “reliance on local volunteers”.
 - There should be “no cost” to volunteers, etc associated with disposing of beach litter.
 - Actions perceived missing under this objective included those that could support a more “coordinated approach” involving all relevant parties, and “investment in marine litter clearance” by the Scottish Government.
- Further, there was a request for actions that provide increased funding/ support to enable “local authorities to make collection and recycling much more accessible” and convenient. For example, by providing more skips free of charge for beach cleaning purposes at marina, port and beach locations, more recycling bins, larger litter bins, and marine litter safe disposal areas. Here, it was noted that the “level of support across local authorities differs greatly” and that “voluntary groups in many areas are expected to fund their own skips - £500 each”. Additional financial support for local authorities was considered necessary “otherwise people are discouraged from picking up items from their local beaches, etc”. Implementing measures to ensure marine (and all) waste/litter was managed responsibly and dealt with sustainably to avoid beach litter going to landfill (e.g. recycle, reuse and repurpose) were considered vitally important. Another viewpoint expressed was that the provision of skips could be “collected and paid for jointly” by relevant industries and fishing grants”.

5.11 The following quotes reflect the points raised:

“We know from the communities and community-groups who conduct beach litter picks that local authorities are struggling to facilitate and pay for the removal and disposal of fishing gear found on beaches. Many of the groups that we work with are having to deal with it themselves; in some cases, this is deterring groups from litter picking on beaches, as the waste that they collect will not be picked up. We do not believe that the action to ‘explore a mechanism’ and the related deliverable of ‘information to assist relevant parties’ goes far enough in terms of contributing to the achievement of the objective. Volunteers, often as part of community groups or NGOs, are vital players in the remediation and clean-up of marine litter, and the disposal of the litter they collect should never cost them money. Therefore, there is scope for the cost of this to be met via a comprehensive EPR scheme”.

Keep Scotland Beautiful

“Work with councils to make it clear and obvious what is to be done with large amounts of litter collected by volunteers, including litter that might be brought to shore in remote areas, such there is little difficulty and no cost for those volunteers”.

Individual

“The polluter should pay.....properly involve themselves in clearing up beach.... Communities should not have to pay a single penny to clear up litter on their beaches - nor should they have to do the work themselves”.

Individual

“A particular challenge.... on marine litter, is on understanding who is responsible for the collection and disposal of litter on the coast and foreshore.....most of this falls to the Local Authority but there is ambiguity around the extent of their responsibility and for which types of litter and in which locations. Clarity on this would be useful so that people know who is responsible and who to contact. Likewise, the establishment of for example a recognised hotline that community groups/members of the public etc can contact on litter issues would be useful. Local Authorities would benefit from increased resources to ensure they are able to pick up litter that is collected both by individuals or community groups. Marine litter is often found in remote locations which are difficult to reach and/or difficult to arrange collection. It would be useful for the Strategy to put mechanisms in place able to address these issues. As a starting point, it would be useful to undertake an assessment of facilities available, opportunities for transportation to a central facility or hub and the need for short-term storage of marine litter”.

Crown Estate Scotland

“...employing someone to clean, monitor and survey is the most effective way to clean the coastline. This method drastically increases the quantities of plastic being removed and it increases the efficiency of cleaning, thus allowing more coastline to be covered than by just relying on volunteers”.

Plastic@Bay

“It is not just the cost of disposal of collected marine litter that is the problem but also the convenience of the process. Some recreational boaters have cleaned beaches in remote areas but sometimes all that can be done is to pile plastic above the high-water mark. There are regrettably few places where the amount of beach litter can be considered small, but disposing of even small amounts of litter can pose problems.....Collecting marine litter provides the start of a awareness journey for many, with beach cleans being central to organisations taking action, or being seen to take action, on environmental issues”.

Royal Yachting Association (RYA) Scotland

“Work inland, both on rivers and in strips of land adjacent to the coast, is important in reducing marine litter. Beach cleans are the final opportunity to stop litter, often generated inland, from entering the sea. However, beach cleans, indicate a failure of systems elsewhere and a need to direct policy at sources of marine litter rather than the end product”.

Think About Plastic - Arran

5.12 Within its response, the Marine Conservation Society noted its support for the actions but recommended “a cost benefit analysis was done on these projects” (i.e. the action to ‘explore a mechanism to assist communities to reduce costs in disposing of large volumes of collected beach litter’ and the action to ‘expand the Keep Scotland Beautiful Upstream Battle project or equivalent riverine project’ – see below) “to ensure effort and funds are deployed for the highest environmental gain” and to “assess impact for future investment”.

Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal

5.13 The planned action of ‘expansion of the Keep Scotland Beautiful Upstream Battle project or equivalent riverine project’ that sits under the objective to ‘increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal’, attracted the following commentary.

5.14 The range of points raised centres on the following:

- Keep Scotland Beautiful noted that the continuation, scaling up and extension of such projects were important in terms of “preventing marine litter by stopping those items littered in the terrestrial environment from reaching the sea”.

- Wider comments further highlighted the importance of preventing marine litter at source and tackling the problem upstream. Such comments noted the role and volume of land-based litter ending up in the sea, and the need for further action to “address litter reduction in rivers and estuaries”, “reduce contamination from land and raw sewage”, “direct policy at sources of marine litter” or a wider suggestion that “remote river monitoring schemes could be set up”.
- Here, there was also feedback from other organisations involved in the Keep Scotland Beautiful Upstream Battle project. For example, Friends of Dumbarton Foreshore emphasised the growing issue of “unpickable micro and nanoplastics” on the shore, and that they expected to see “ever greater volumes of plastic waste... until production is stemmed”.
- The UK and Ireland Spill Association highlighted the important “co-ordination” role of NGOs (Rivers Trust and their Scottish equivalents) in assisting with delivery of the objective to increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal. The Association noted that such organisations could “access their volunteer banks to conduct much of this work. It would help their effort if they were able to display signs e.g. Volunteers from XXX charity help you to enjoy this beach/river/lake by collecting litter from it. It improves your enjoyment of it but protects our wildlife. Take your litter home. Want to help visit www.xxxxcharity.org”.

5.15 A couple of comments related specifically to the key deliverable identified in the Consultation Document, namely that ‘three of Scotland's main rivers to be involved in litter projects that include removal and responsible disposal of waste’. Here, the feedback from two individual respondents is presented below.

“A national Strategy is required to address litter reduction in rivers and estuaries. Why have only three rivers been included in the plans? Whilst I understand that some pilot schemes need to be tested for success.... I would urge that this pilot stage be set out as such with a timeframe and date for all rives and estuaries in Scotland to then be operationalised and included in the overall Strategy”.

Individual

“Many of the above actions could/should extend to other river catchments”.

Individual

Expansion of the Fishing for Litter project

5.16 Mixed views were provided on the two actions related to the ‘expansion of the Fishing for Litter project’ objective.

5.17 On the one hand, the action to ‘promote the Fishing for Litter scheme within the fishing industry and to ports, harbours and fishers not currently participating’ was welcomed and supported. Here there was feedback that considered the project to be a “good approach”. Continuing to work in partnership with the commercial fishing industry was also considered vital.

5.18 There was wider feedback that highlighted the importance of the action being extended to include participation of “small fishing boats” and “all boats landing into Scottish ports”.

5.19 The following quotes reflect the points raised.

“...the scheme does need expansion - and more funding - to be made available and easy to use in every dedicated fish landing port. It also needs more regular attention - to make sure that collection skips are always available and emptied, and that waste bags are available to fishing crews. As well as this, consideration should be given to a legal impetus to oblige all boats landing into Scottish ports to participate in the scheme. No vessels should be coming ashore to land fish, and not also be landing rubbish bags from the duration of their fishing trip”.

Shetlands Fisherman’s Association

“We would support the expansion to the Fishing for Litter project to increase recycling levels of gear and easy access to collection and recycling points. However, the cost of this must be borne through a comprehensive EPR Scheme”.

Marine Conservation Society

“... an urgent need to see this scheme rolled out across the islands and west coast.... Although the role of communities is mentioned.... given the fundamental role that communities play in the removal of marine litter from the marine and coastal environment....actions to support this role would significantly strengthen the Strategy and its outcomes”.

Individual

“The more boats that are Fishing for Litter the better – I think that forming solid relationships to train and support ‘fisherman-scientists’ could lead to the development of a group of mediators who could communicate more effectively between the ‘government scientists’ and people with lived experiences of working in the industry. The Fishing for Litter project could be the start of the process of training willing fishermen”.

Individual

5.20 On the other hand, a couple of respondents (an individual, and a coastal development and conservation organisation) queried more activity aimed at encouraging those not currently participating to become involved in the Fishing for Litter scheme. This feedback was typically framed in the following terms:

- The scheme has been in place for many years and given the scale of marine litter problem (e.g. washed up on beaches, etc) it was difficult to conclude that the scheme had been successful.
- Disagreement was expressed that funding is proposed to continue to be awarded to the Fishing for Litter scheme “to appease the very industry that has caused the damage in the first place”.

Installation of riverine litter removal technology in the River Clyde

5.21 The main points raised on the two actions relating to the 'installation of riverine litter removal technology in the River Clyde' objective can be summarised as follows:

- Some posed questions on the planned focus of use of riverine litter removal technology in the River Clyde only. Points raised included that it could be installed in "other rivers", known "hotspots" across the country, and/or that measures may need to be taken to clear up the banks and floor of its tributaries/other river catchments/include litter sinks in the rivers Kelvin, Cart, Forth and Clyde Canal, etc to achieve "significant impact".
- There was agreement with the action plan that the boom installed would need to be appropriately monitored and maintained – and followed up with effective community engagement.
- The technologies to remove waste in conjunction with the boom and the boom itself would need to be closely monitored to ensure no unintended consequences, for example, on wildlife and environment in the river.

Wider Points

5.22 Similar to wider points provided under other Strategic Directions, there were a variety of other comments that highlighted more general points that cut across the refreshed Strategy and Action Plan as a whole:

- The important role of education and awareness raising, including ongoing community and public engagement and involvement.
- Disappointment was expressed that the bottle and can return scheme in Scotland was delayed – it was reported that this could have had an "immediate and significant impact on the amount of plastic and glass bottles being littered and finding their way into the sea".
- Pollution from pharmaceuticals in rivers was identified as an increasing problem, "with UK rivers now identified as some of the most polluted by pharmaceuticals in Europe". KIMO UK suggested that implementation of measures to address this could be included under Strategic Direction 3 and/or Strategic Direction 4 – "starting with monitoring and a background report to assess the extent of the issue".
- Actions to share and promote research into the removal of micro plastics in the marine environment could be considered.
- That there could be further consideration of the use of incentives and/or fines/penalties and/or actions to restrict the production of plastic.

6. Strategic Direction 4

Strategic Direction 4: Improve monitoring at a Scottish scale and develop measures for Strategy evaluation.

Context

- 6.1 It is widely recognised that the current evidence base for the levels of marine and coastal litter is limited, and the Strategy seeks to build on existing data capture and management measures so that we can help deliver appropriate and reliable data. This could help provide information on the types, quantities and distribution of marine litter, to provide an insight into the associated problems and threats, and to increase public awareness of the condition of the coastline.
- 6.2 The UK Marine Strategy is being implemented in a co-ordinated way across the UK Administrations. The UK Marine Strategy Part Two sets out proposals for UK monitoring programmes to monitor progress towards Good Environmental Status (GES), which will be reflected in the Marine Litter Strategy. Data collected for GES monitoring will facilitate reporting on whether the Marine Litter Strategy's aims and objectives are being met.
- 6.3 Planned actions for the Marine Litter Strategy for Scotland include, for example:
- Contributing to the development of an agreed methodology for inter-tidal microplastic monitoring.
 - Improving the quality of the data being obtained from litter removal projects.

Question 7: To what extent do you agree or disagree that the planned actions under each objective will contribute to the achievement of Strategic Direction 4?

- 6.4 **Table B15 to Table B19** ([Appendix B](#)) provides the frequency tables to **Question 7**.
- 6.5 The vast majority of respondents (individuals and organisations) agreed (i.e. agreed or strongly agreed) that the planned actions under each of the five objectives would contribute to the achievement of Strategic Direction 4:
- Use of Fishing for Litter initiative data to evaluate industry engagement (85.9%).
 - Accurate assessments of marine plastics in Scottish waters (86.0%).
 - Development of an agreed methodology for inter-tidal microplastic monitoring (82.9%).
 - Social science evaluation of the Marine Litter Strategy (81.4%).
 - An understanding of Scottish island beach litter (89.7%).

Question 8: Do you consider there to be any omissions or gaps in the planned actions identified under Strategic Direction 4 in the Consultation Document that could help to contribute towards its achievement?

- 6.6 Views were mixed. Around one-third each answered “yes”, “no”, or “don’t know” to the question on whether there were any omissions or gaps in the planned actions identified under Strategic Direction 4, **Table B20**.
- 6.7 Organisations were more likely to report omissions or gaps compared to individuals, in particular those with a focus on the issues of coastal development and conservation, or communities.

Omissions or Gaps Identified

- 6.8 The wider qualitative feedback has been grouped under each of the five objectives identified for Strategic Direction 4.

Use of Fishing for Litter initiative data to evaluate industry engagement

- 6.9 Around one-fifth of those respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 4 commented further on the objective regarding the ‘use of Fishing for Litter initiative data to evaluate industry engagement’.
- 6.10 Many highlighted that debris and waste from the fishing industry accounted for a significant proportion of marine litter in Scotland citing both academic and anecdotal evidence (e.g. twine and ropes washed ashore).
- 6.11 For example, the voluntary organisation Plastic@Bay referred to a Marine Scotland study which reported that “fishing gear accounts for just 6% by abundance but 41% of the total weight of plastic found in beach surveys in North-East Scotland”.
- 6.12 Several respondents emphasised the importance of weighing and sourcing to provide a more accurate assessment of marine litter.
- 6.13 The fact that the Fishing for Litter initiative addresses industrial marine litter at source underpinned much of the support for the planned actions to increase engagement with new and participating harbours and to improve the quality of data collection.
- 6.14 A wider point, raised by a few respondents, was that sufficient infrastructure, such as weigh bridges, would be required at harbours across Scotland to facilitate greater industry engagement. Further, capacity constraints within the fishing industry was also raised as a potential issue/challenge in terms of data collection.

6.15 The following quotes help to further illustrate some of the points outlined above:

“Provision of facilities to recycle marine litter is key. At present we understand that very little marine litter, and marine plastics in particular, is recycled with most going to landfill. This is due to a lack of dedicated facilities set up to recycle litter in Scotland. Provision of facilities in Scotland able to reprocess and repurpose recyclables would be positive.”

Crown Estate Scotland

“Volunteers are not professional scientists and surveyors. They will generally participate in monitoring pollution during the summer months, when it is pleasant. The most populated areas will have the most volunteers and thus will be most surveyed.”

Plastic@Bay

“We need weigh bridges or suitable machines which can accurately weigh what is coming in, unless the collecting venues have these facilities; weighing area at every port ~ could beach cleaners have similar skips for fishing gear retrieved from the beach? Some of our ropes washed up are massive, cannot be moved or weighed by hand.”

OceanGives

“More checks required on the quantities of waste put ashore...and assessed if the quantity is accurate according to the time at sea and the number of crew members.”

Individual

Accurate assessments of marine plastics in Scottish waters

6.16 Almost one-third of those respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 4 commented further on the objective relating to ‘accurate assessments of marine plastics in Scottish waters’.

6.17 The main points raised can be summarised as follows:

- The action to expand OSPAR monitoring beaches to include an open coast northeast beach was in the main welcomed given the “significant difference between islands and mainland areas in terms of the type and volume of marine litter.”
- As stated above in relation to the Fishing for Litter objective, several respondents reinforced the importance of weighing and identifying the source of marine litter to provide an accurate assessment of marine plastics in Scottish waters.

- On beaches with large volumes of marine litter, volunteer capacity was highlighted as a potential barrier to providing accurate assessments. For example, it was reported that rural and remote areas (e.g. island communities) were disproportionately impacted by a lack of volunteer capacity given they are generally less populated than other areas.
- A general point raised regarding accurate assessments of marine plastics were the limitations posed by seasonal and geographical variations in data collection. For example, it was highlighted that wind strength and tide direction can impact on the accuracy of assessments as marine litter can be moved and deposited elsewhere between assessments. Therefore, the conditions “highlight the “pot luck” element of infrequent measurements not tied to specific wind/tide conditions”. It is important to note that this challenge is not unique to OSPAR and applies across all methodologies.

6.18 The following quotes help to further illustrate some of the points outlined above:

“In addition to expanding OSPAR monitoring beaches to include a northeast beach, there are many sources of data which could be utilised to inform a general picture of marine litter around Scotland. For example, we at Think About Plastic-Arran (TAP) have detailed data, which has been collected using the scientific methodology used by Marine Conservation Society, for 12 beaches around the coast of the island which covers 2018, 2019, 2020, 2021. The data has been analysed to provide information about the type and quantity of coastal litter collected at specific sites around each coastline of the island and has also been amalgamated to provide an overall picture for the island. (All 12 beaches have different litter profiles). The data is also used to monitor the effectiveness of strategies employed by TAP e.g. business accreditation which has reduced the amount of plastic used by Arran businesses.”

Think About Plastic - Arran (TAP)

“Many rural areas do not have the manpower numbers found in or near a city. Coves difficult to access, beaches miles from roads. It requires far more work than on the mainland densely populated areas... It is essential Island data collection is financially supported by employment of beach clean coordinators. It takes a huge amount of time to carry out beach cleans and surveys in areas where the amount of rubbish is extensive and populations limited.”

OceanGives

“We welcome the expansion of monitoring areas to include ‘an open east coast beach’, in order to more accurately assess ocean plastic pollution in Scottish waters.”

Plastic@Bay

Development of an agreed methodology for inter-tidal microplastic monitoring

- 6.19 Approximately one-fifth of respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 4 commented further on the objective regarding the ‘development of an agreed methodology for inter-tidal microplastic monitoring’.
- 6.20 Much of the feedback referred to monitoring of marine litter in general terms rather than specific reference to inter-tidal microplastics.
- 6.21 Where there was specific reference to inter-tidal microplastics, feedback from several respondents supported a harmonised approach to the development of an agreed methodology as set out in the action plan. It was noted that such an approach could avoid duplication of effort and encourage consistency and comparison of data.
- 6.22 To this end, the UK and Ireland Spill Association made specific reference to existing and developing methodologies which may be useful. This included: Centre for Environment, Fisheries and Aquaculture Science who are working on a methodology for sediment microplastic monitoring; Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection who have published guidelines for the monitoring and assessment of plastic litter in the ocean; and a study of laboratory methods for the analysis of microplastics in the marine environment published by National Oceanic and Atmospheric Administration which includes “recommendations for quantifying synthetic particles in water and sediments [that are] internationally adopted as the current standards.”
- 6.23 Keep Scotland Beautiful also supported a harmonised approach to developing an agreed methodology and suggested that there may be value in “linking terrestrial and marine litter perception surveys and methodologies in order that a joined-up picture can be generated.”
- 6.24 The following quotes help to further illustrate some of the points outlined above:

“With an agreed methodology, such as the protocol of the Marine Conservation Society, and engagement with RYA Scotland, it should be possible to use recreational boaters to collect information from remote anchorages.”

Royal Yachting Association Scotland

“There is a lot of effort going on internationally and nationally. Do not waste resource by duplicating effort... If a different method is used please ensure it is internationally understood and share the outcome and learnings as we are all learning to navigate our way through this relatively new challenge.”

UK and Ireland Spill Association

“The survey method using OSPAR methodology.... does not accurately record the impact of some industrial plastic pollution in Scotland. We believe this is a major omission that skews perception of the most important sources of marine plastics: This method surveys the abundance of beach litter, i.e. the number of individual items. However there is a major difference in size between industrial-scale plastic fragments and mismanaged waste pollution. In consequence, numerous small items could hide the major pollution in volume. The danger of plastics comes mainly from their fragmentation potential - the bigger the initial size of the piece of plastic, the higher the risk. We consider that both the source and the size of plastic fragments (measured by their weight) are critical to understand plastic pollution. This is why many groups are now considering measuring the weight of the debris in their research.”

Plastic@Bay

“Seems little point monitoring microplastics whilst there are huge amounts of visible plastic littering the shore. Ultimately this will be a source of microplastics for hundreds of years. Better to clear and monitor the larger plastic items.”

Individual

“Pollution is site specific and will be influenced by local human activities, past and present. To be able to evaluate and solve a local pollution issue, the monitoring method should be adaptive.”

Community of Arran Seabed Trust

“Data is an important tool in tackling the issues related to litter and littering, therefore a common monitoring system (such as the Litter Monitoring System) that enables a better understanding of the litter on land and beaches that could end up in the sea should be encouraged for clarity and consistency. The LEAMS data gathering methodology enables indicator data to be collected, and is aligned to the Code of Practice on Litter and Refuse (Scotland) 2018 ‘CoPLaR’. CoPLaR, and therefore LEAMS provide a system of zoning to monitor and understand litter pathways. These tools could be particularly useful with regard to marine litter if applied more consistently by duty bodies.”

Keep Scotland Beautiful

“Supporting fishermen and fishing communities to play an active part in the process of designing methods, monitoring and assessing plastic and micro-plastic debris found in intertidal zones would help to bring communities and legislators together. Would there be possible job opportunities?”

Individual

Social science evaluation of the Marine Litter Strategy

6.25 Ten percent of respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 4 commented further on the objective regarding a ‘social science evaluation of the Marine Litter Strategy’.

6.26 A point raised was that a public attitudes survey may be too subjective to gather reliable data on which to base an evaluation of the Strategy. It should be noted that the social science evaluation, by its very nature, is to gauge how individual people value the natural environment – it is not meant to be a substitute for scientific monitoring. Therefore, it was considered important to make the distinction between perceptions and reality of the scale of the marine litter problem, as well as the extent to which attitudes translate into action.

6.27 Another point raised was that careful consideration would be required to gather a representative sample - “visitors are particularly important participants in the marine litter scenario”.

6.28 The following quote helps to further illustrate some of the views provided:

“Attitudes often differ from actions, and it is extremely difficult to elicit reliable evidence to support actions following through from attitudes. Visitors are particularly important participants in the marine litter scenario, and it would be important to ensure they are represented in the sample surveyed. Our own data collection indicates that much litter is generated 'accidentally' and some comes from elsewhere, carried on tides, so whilst attitudes are important, they are only a small part of the picture... In the case of Arran, much marine litter collects in inaccessible and seldom visited places and therefore out of the eyes of many members of the public. Their attitude may be different if they had a clear picture of the issues.”

Think About Plastic - Arran (TAP)

Understanding Scottish island beach litter

6.29 Over one-third of respondents who considered there to be omissions or gaps in the planned actions identified under Strategic Direction 4 commented further on the objective of ‘understanding Scottish island beach litter’.

6.30 The main points raised can be summarised as follows:

- Most respondents welcomed the objective and plans actions to better understand Scottish island beach litter. There was recognition of the different challenges faced in Scottish island communities regarding beach litter compared to other areas. However, others questioned why the objective and actions only related to the Scottish islands. For example, it was noted that other rural areas in the mainland face some similar challenges e.g. Dumfries & Galloway was explicitly mentioned. Opportunities for knowledge sharing and lessons learned from the monitoring data was therefore considered important.
- Marine litter is said to be an enormous challenge for island communities. Given that they are less populated than other areas (e.g. more difficult to attract/retain volunteers), wider feedback highlighted a need for additional financial support to tackle the issue of marine litter in island communities. It was suggested that the creation of jobs and other opportunities (e.g. development officers, beach clean coordinators/rangers, studentships, etc) could help ease the burden of limited volunteer capacity particularly where physical collection of data in island communities is “difficult” and “time consuming”.

- A few respondents questioned the need for a pilot study when the problem of beach litter in island areas is well established, and that urgent action was now required.
- Albeit each point was raised singly by a respondent, potential gaps highlighted a need to ensure monitoring covered inhabited and uninhabited islands, and litter sinks in estuaries and sea lochs.

6.31 The following quotes help to further illustrate some of the points outlined above:

“The Marine Conservation Society welcomes the focus on marine litter on Scottish Islands and would welcome support to add another OSPAR monitoring beach to a Scottish island location.

With many beaches across Argyll and Bute, Highlands and Islands, Aberdeenshire and Dumfries and Galloway reporting high levels of beach litter, any monitoring support for beaches with high levels of marine litter on Scottish Islands should also be shared with beach cleaners on mainland Scotland facing similar levels of litter.”

Marine Conservation Society

“The inclusion of the objective to understand Scottish island beach litter and the associated actions are very welcome. The SIF Marine Litter Working Group had discussions with Marine Scotland which, highlighting a lack of island data, was followed up with a proposal for...a three-year funded study into island marine litter data... the pilot study mentioned within the actions is therefore all the more pressing. Data informs actions and further development and therefore given the urgency of the need to tackle marine litter in the islands...we would strongly support a change in timescale to ‘short’, and ideally within the year ahead.”

Small Isles Community Council

“I see why Scottish island beach litter is singled out, but surely some of the NW coast remote, rural mainland beaches should be included.”

Individual

“Understanding the sources of Marine Litter is important on all Scotland's shores, not just the islands, so a wider study is essential.”

Scottish Fishermen's Federation

Wider Points

6.32 Many of the wider points raised under Strategic Direction 4 reinforced support for prioritising effective enforcement and legislation rather than data monitoring. To this end, a view expressed was that action should not wait for data to be collected particularly when the scale of the challenge regarding marine litter was well established. Some expressed frustration at the perceived lack of action undertaken to date.

6.33 In addition to monitoring activity, increased education and awareness of the sources of marine was again highlighted as an important tool to help address the issue.

6.34 The following quotes reflect the broad nature of comments:

“Evaluations and data collection should directly feed into strengthening legislation to stop this, especially stopping poor practice and banning of materials (where possible) that contribute to these problems.”

Individual

“Assessing and evaluating is a waste of taxpayers’ money. We know it there, there is plenty evidence and data from all around UK and the world. The effort should be in stopping it, not just looking at it, counting/ weighing it and wasting more time writing it up. Just act, the evidence is there on every beach/ river/ shoreline walk that anyone makes.”

Individual

7. Strategic Direction 5

Strategic Direction 5: Maintain and strengthen stakeholder co-ordination in Scotland, the UK, regionally, and globally.

Context

- 7.1 Marine litter is a cross-boundary challenge that spreads across a variety of scales and requires action from the local to the international level. The Strategy aims to influence actions within its direct sphere of Scotland, and more broadly at the UK, regional, and international levels.
- 7.2 Planned actions will include, for example, strengthening working relationships with UK, regional, and international partners to contribute to future work and share best practice.

Question 9: To what extent do you agree or disagree that the planned actions under each of the following objectives will contribute to the achievement of Strategic Direction 5?

- 7.3 **Table B21 to Table B24** ([Appendix B](#)) provides the frequency tables for **Question 9**.
- 7.4 The vast majority of respondents (individuals and organisations) agreed (i.e. agreed or strongly agreed) that the planned actions under each of the four objectives would contribute to the achievement of Strategic Direction 5:
- Expand communications and understanding of Marine Litter Strategy work with delivery partners (89.0%).
 - Build on and strengthen working relationships with wider UK (83.2%).
 - Increase engagement with OSPAR through: participation in and implementation of the Regional Action Plan for Marine Litter; and taking a lead role with relevant actions (80.8%).
 - Strengthen co-ordination across the British-Irish Council region (83.4%).

Question 10: Do you consider there to be any omissions or gaps in the planned actions identified under Strategic Direction 5 in the Consultation Document that could help to contribute towards its achievement?

- 7.5 A relatively high proportion of respondents overall (and individuals in particular) were unsure whether there were any omissions or gaps in the planned actions identified under Strategic Direction 5 (39.8%). Just over one-quarter (27.6%) considered there to be omissions or gaps, **Table B25**.
- 7.6 In relation to organisation responses, those with a focus on the issues of coastal development and conservation, or environment and conservation, were more likely to consider there to be omissions or gaps in the planned actions.

7.7 Further, a relatively high proportion of gaps identified were not relevant in this Section and referred to other Strategic Directions, and which have been taken account of in previous Sections.

Omissions or Gaps Identified

7.8 The wider qualitative feedback has been grouped under each of the four objectives identified for Strategic Direction 5.

Expand communications and understanding of Marine Litter Strategy work with delivery partners

7.9 The action under this objective, namely 'identify opportunities to engage with relevant authorities and organisations to promote marine litter work' attracted feedback in the main from organisations with a focus on communities.

7.10 Much of the commentary noted that community groups were a valuable resource, both in terms of undertaking litter picking activities as well as in helping to provide intelligence through surveying and monitoring activities.

7.11 Local community groups were also seen by some respondents as important advocates for national campaigns and key actors in driving change in their local communities.

7.12 As such, community groups and volunteers were viewed as an integral part of helping to deliver the Strategy and that this could be more fully reflected and acknowledged within the document. The importance of regular and ongoing community engagement and involvement was also considered vital.

7.13 The following quotes illustrate these points:

"It might also be helpful to strengthen and value their (community volunteers) role which is increasingly about surveying and monitoring as well as prevention.

I have been in contact with a lot of volunteers from around the Scottish coast over the last few years and some are absolutely phenomenal in the work they do."

East Haven Together and Angus Clean Environments

"The volunteers and local community groups don't need motivating or educating. The agencies on the other hand need to catch up with the grassroots movement to clean up marine litter. The agencies need to put feet on remote beaches and get in touch with the grassroots population which are doing this work voluntarily. The island/rural public and our island visitors are well informed and are way ahead of the game"

Skye Tidy Tidelines

“It is important to involve communities in the ongoing process; not just as consumers of campaigns. There are many active community groups driving change at the local level - involving, informing & platforming them will help make change happen for the best.”

Individual

Build on and strengthen working relationships with wider UK

- 7.14 The objective to ‘build on and strengthen working relationships with wider UK’ attracted the most qualitative responses under Strategic Direction 5 – primarily from organisations.
- 7.15 The comments largely related to the action to ‘work with UK Government and Devolved Administrations to share UK-wide approaches on shared issues where appropriate’.
- 7.16 Here, feedback emphasised that marine litter is a transnational issue and that action by Scotland alone is unlikely to address the problem. Further, the importance of collaboration was emphasised to help ensure effective cross-border partnership working and to avoid duplication of effort, etc.
- 7.17 The following quotes illustrate these points:

“All hinges on collaboration - looks great in theory but if all UK does not sing from the same hymn sheet then surely Scotland’s role will be limited.”

Individual

“To tackle effectively the issues of marine litter it is essential that communication and collaboration, along with policy development, be consistent and sustained across all four UK nations. Therefore, we are supportive of building, strengthening and expanding working relationships and understanding of the work of the Marine Litter Strategy.”

Keep Scotland Beautiful

Increase engagement with OSPAR through: participation in and implementation of the Regional Action Plan for Marine Litter; and taking a lead role with relevant actions

- 7.18 There are two planned actions under this objective, namely:
- ‘Lead on a relevant task within the updated OSPAR Regional Action Plan for Marine Litter (to be identified once published)’.
 - ‘Scotland to be represented at two OSPAR committees: Environmental Impact of Human Activities (EIHA); Hazardous Substances and Eutrophication (HASEC)’.
- 7.19 There were few comments on either action beyond two which welcomed increased engagement with OSPAR.

Strengthen co-ordination across the British-Irish Council region

- 7.20 Under the objective to 'strengthen co-ordination across the British-Irish Council region', the planned action will 'through the role of co-chairing the Marine Litter Working Group, Marine Scotland will identify tasks for collaboration regarding shared marine litter problems'.
- 7.21 This action also attracted few comments, and the main feedback was that such collaboration would be vital.

8. Final Comments

Question 11: Do you have any final comments that you would like to make on the draft Marine Litter Strategy or Action Plan that have not been covered elsewhere in your consultation response?

- 8.1 Almost two-thirds of respondents provided final comments to the consultation, which have been grouped under the following headings ordered by frequency. Comments were typically from individuals and organisations who took the time to re-emphasise points already made.

Wet wipes and single use plastics

- 8.2 By far the most common final comment (one-third of the total comments) called for a ban or limitation on wet wipes in general, wet wipes containing plastic, and/or single use plastic items. Almost all were from individuals, with most forming part of a standard campaign response.
- 8.3 The same campaign response called for the ban on wet wipes containing plastic and a move towards more reusable products. It also called for an EPR scheme so that businesses paid the costs of clean-up. The full campaign response is quoted below.

“I support a ban on wet wipes containing plastic. But, simply substituting plastic with another single-use material will not be enough by itself. We also need to support consumers to move to reusable products and apply EPR (where companies would pay the full costs of their product disposal including clean ups) to all other single-use wet wipes. These measures should be applied to all sanitary items which have similar issues and solutions. In the long term we want to see action at a larger scale, there is no longer time to solve the plastics crisis item by item, we need systemic change to move to a reusable and circular economy.”

Campaign response from multiple individuals

- 8.4 Other quotes included:

“Long term, the aim should be to have no potential for waste entering the marine environment. the banning of products likely to enter the system, education and provision of resources to prevent larger waste to enter the system and the encouragement to industry to replace plastic gear with biodegradable alternatives. this last item will probably be the toughest due to cost and efficiency”.

Individual

“Along river banks, single use plastics including...sanitary products, notably sanitary pads and wet wipes, are often found. Can the versions containing plastic be banned, at least wet wipes?”

Individual

“Take away meal packaging needs to be biodegradable but this is often seen as an expensive option so banning non biodegradable packaging would be a step forward and complement the banning of plastic straws.”

Individual

Comments supportive of the Strategy

8.5 The second most common final comment (about 11% of all comments) were those that expressed broad agreement with the overall Strategy and expressed thanks to Marine Scotland/Scottish Government for developing the Strategy. Such comments were primarily from organisation respondents.

8.6 Quotes included the following:

“British Marine Scotland welcomes this consultation, believes the Marine Litter Strategy is necessary and is in agreement with aim of the Strategy - to help realise the vision of 'clean, healthy, safe, productive, and biologically diverse marine and coastal environment that meets the long-term needs of people and nature, and is in agreement with the 5 Strategic Directions.”

British Marine Scotland

“Scottish Water are supportive of the proposed measures under the Marine Litter Strategy”.

Scottish Water

“Overall, the Strategy and the commitments it contains are welcome and the achievement of Marine Scotland in developing the Strategy acknowledged, as well as the difficulty of delivering impact across the scale and scope of marine litter challenges, particularly where budgets are increasingly stretched.”

Scottish Islands Federation

Comments suggesting the Strategy does not go far enough

8.7 There were a small number of comments from individuals and organisations which indicated that the Strategy did not go far enough in addressing marine litter.

8.8 The main points raised were as follows:

- The severity of the issue of marine litter was raised, including support for more urgent and immediate action.
- The action plan could also be more ambitious or aspirational to tackle the seriousness of the situation.
- There was recognition of the issue of a lack of credible data on the volume, nature and source of marine litter, and that this made the targeting of actions more difficult.

Greater support for voluntary/third sector

- 8.9 The important role played by communities/community groups in tackling marine litter was also emphasised.
- 8.10 Some responses highlighted communities as an under-utilised resource to support delivery of the Strategy and suggested that Marine Scotland could benefit from greater community engagement and participation. Alternatively, some responses noted the over-reliance on communities and volunteers to support marine litter removal activities.
- 8.11 Quotes included:

“Currently there is too much focus or responsibility on individual actions and volunteers who clean up the mess created by plastic and other producers. For example the shores of the Firth of Forth are littered with millions of plastic pellets and micro plastics, plastic producers are directly responsible for this. This is a problem that needs solved by making the companies take action to solve this and to reduce the production of plastic/single use items.

Individual

“Scotland has an extensive number of visitors engaged in walking and other activities around the coast. Engage and utilise them to monitor, provide a central hub for reporting beaches with a heavy litter load and make it easy for them to collect and dispose of litter. Those of us who walk remote beaches are aware of the issue and in many cases happy to help but it is incredibly frustrating to have nowhere to dispose of litter collected and man-hauled back and to have no way of reporting issues with any hope of a clean up either being coordinated or supported.”

Individual

“Make it easier for Citizens, Communities & Interest Groups to Drive Change. There are many in Scotland who are passionate about the health of our seas. Empower them as Ambassadors for change”.

Individual

9. Business and Regulatory Impact Assessment

Context

9.1 To help us determine the impact of the actions proposed in the Strategy, we are interested to find out if these proposals would lead to increased costs and/or impact on resources for you or your business (if applicable). Any comments received will be used to inform the final Business and Regulatory Impact Assessment (BRIA) which would be prepared as part of the Strategy development process.

Question 12: Do you think that any of the proposals/actions in this consultation have any financial, regulatory or resource implications for you and / or your business (if applicable)?

9.2 Almost one-quarter (23.0%) of respondents, primarily organisations, reported that the proposals/actions in the Consultation Document would have any financial, regulatory or resource implications for them and/or their business/organisation, **Table B26** ([Appendix B](#)).

9.3 Organisations with a focus on the issues of coastal development and conservation, or environment and conservation, followed by industry were more likely to consider that the proposals/actions would have implications for their business/ organisation.

9.4 The BRIA is focussed on a business impact assessment, and as such not all comments from individuals may be relevant/evidenced.

If “Yes”, please specify which of the proposals/actions you refer to and why you believe this would result in financial, regulatory or resource implications for your business.

9.5 The most common response was from individuals who considered that financial implications would likely be inevitable for businesses and/or consumers, and that this may be the only way to drive change and solve the problem of marine litter.

9.6 For organisation respondents (excluding industry) the main concern was that any expansion of their activities, such as litter picking/removal or monitoring would entail extra costs/resources and therefore require additional funding.

9.7 A few comments mentioned that the provision of core funding could be beneficial for community groups to help sustain/expand existing activities. A related point was that funding could be difficult to attract for existing activities with some funders keener to support new and/or innovative activities.

9.8 Representative quotes included:

“Operated by KIMO UK, the UK is host to the largest Fishing for Litter project in Europe (probably in the world) in terms of numbers of participating ports and vessels and the project continues to grow, such that it will be nearly doubled in terms of the number of ports participating compared to a baseline of 2019. The greatest cost to the project is of waste disposal....KIMO UK has not infrequently found itself in a position where it must take funds from its own reserve to cover the extra cost of waste processing. This is clearly not sustainable. There are solutions, based around a cost recovery system that can be sufficiently flexible and can offset the cost of waste management, however these may involve an extra administrative burden on both harbour staff and local authorities”.

KIMO UK

“Community groups and charities who are already dealing with this mass pollution event need core funding to employ staff to do this incredibly repetitive, physically demanding job. That should be the starting point”.

Islay Development Initiative

9.9 Industry respondents connected to the wet wipe industry noted that there could be a significant cost increase of 40% or more in the event of a ban on wet wipes containing plastic. Further, this could impact on both domestic and commercial users.

9.10 In the event that there was any requirement for the reformulation of wet wipes, an appropriate timeframe for implementation was considered preferable so that existing products do not need to be withdrawn from the market. This could limit costs for producers and the environmental impact of disposal.

9.11 Below are some quotes which illustrate these concerns:

“Gama Healthcare would urge that a recognition is made between “Consumer” wet wipes and “Professional” wet wipes. A transition to a “plastic free” version of a professional wipe for surface disinfection purposes would currently result in an estimated 40% on cost for the cost of the nonwoven material used to fabricate the wipe. It is further anticipated that during the next year (December 2021 to December 2022) the cost of cellulose based fibres will increase an additional 40%. So, we would not only have a less efficacious product, but we would also have a more expensive product.”

GamaHealthcare Ltd

9.12 On the fishing industry side, the Scottish Fishermen’s Federation reported that new technologies for tackling fishing based marine litter could likely impose costs on the Scottish fishing fleet. Salmon Scotland also reported that continuing to support action on tackling marine litter could have cost implications for the aquaculture industry, but also that it could bear these costs to benefit the environment.

Appendix A: Action Plan

Table A1: Strategic Direction 1 Action Plan

Objective	Action	Deliverable	Timescale	Responsible lead
Encourage positive behaviour and deter littering and flytipping.	In co-ordination with the National Litter and Flytipping Strategy delivery team, strengthen the enforcement of litter and flytipping regulations.	1) Conduct an evidence review of the barriers to enforcement.	1) Short term	Scottish Government - Zero Waste Policy Team
		2) Make necessary changes subject to the outcome of the evidence review.	2) Medium to long term	
Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear.	Develop a waste management scheme that assures improved management of end-of-life fishing gear. Work will include evidence gathering, industry engagement, policy and legislative development, and consultation.	A waste management scheme for fishing gear (including aquaculture). To align with the EU Single-Use Plastics Directive.	Medium (delivery end of 2024)	Scottish Government - Marine Scotland
	Work with the European Committee for Standardisation (CEN) to develop a standard for the circular design of fishing gear to facilitate better waste management and reduce environmental impact.	A CEN standard for the circular design of fishing gear (including aquaculture).	Medium (delivery end of 2024)	Marine Scotland

	Extend access to Port Waste Reception Facilities to fishing vessels.	All main fishing ports to facilitate responsible end of life gear disposal without additional charges.	Long term	Scottish Government to continue to work with Defra, MCA and other relevant partners on the implementation of this reserved matter
Improve waste management for collected marine litter.	Explore the potential to support the waste sector to consider recycling opportunities for degraded and contaminated marine plastics, including fishing gear.	Capability for processing of marine litter in Scotland.	Long term	Scottish Government
Reduce sewage related debris through a behavioural change campaign.	Develop, launch and run an awareness raising campaign to promote behaviour change and highlight inappropriate flushing of wet wipes and sanitary items containing plastics down the toilet. The campaign will aim to significantly reduce the 36,000 sewer blockages that Scottish Water resolves per annum.	Launch and run a new customer awareness campaign.	Short - medium term (2022-2025)	Scottish Water

Table A2: Strategic Direction 2 Action Plan

Objective	Action	Deliverable	Timescale	Lead
Reduce plastic pellet loss into the marine environment.	Promote across Scottish businesses and across the British Irish Council Region the BSI PAS standard on plastic pellets, flakes and powders. This sets out standards for handling and management of pellets throughout the supply chain to prevent their leakage to the environment.	Increase the numbers of businesses adopting the BSI PAS.	Short - long term	Marine Scotland
	Work with the plastics industry to ensure the minimum requirements, as agreed with OSPAR, to ensure effectiveness, stringency and transparency are met in the development of a certification scheme to demonstrate implementation of third party auditing of the sites handling or managing plastic pellets.	An international plastic pellet certification scheme.	Short - long term	Marine Scotland with the plastics industry
	Review uptake of the PAS, and membership of an international plastic	Review of effectiveness of supply chain approach.	Long term	Marine Scotland with the plastics industry

	pellet certification scheme, once developed.			
Improve the ability of the fishing industry to retrieve lost fishing gear from the sea.	Give support to the development or trials of new tools or technologies that could be of use to the Scottish fishing industry, in order to achieve successful retrieval of lost fishing gear.	Engage with technology companies and fishing industry to support uptake of available technology or gear which would improve the likelihood of retrieving lost fishing gear.	Medium - long term	Marine Scotland - Clean Seas Policy Team, Inshore Fisheries Team; MLSSG
	Work with the British Standards Institution and the European Committee for Standardisation (CEN) to ensure all elements of the waste hierarchy are reflected during the development of the CEN standard for circular design of fishing and aquaculture gear, including supporting reuse by reducing the incidence of gear loss.	CEN standard for the circular design of fishing and aquaculture gear, which includes specifications to address gear loss.	Medium (delivery end of 2024)	Marine Scotland
Reduce sources of sewage-related debris (SRD).	Investigate the potential for legislation to ban the manufacture and sale of wet wipes containing plastic, with a requirement that any alternatives meet the 'Fine to Flush' standard.	Measures to reduce plastic pollution from wet wipes.	Medium - long term	Marine Scotland - Clean Seas Policy Team

	Taking an evidence-based approach, consider a range of policy options to reduce sources of sewage-related debris.	Measures to reduce plastic pollution from various types of sewage-related debris.	Long term	Marine Scotland - Clean Seas Policy Team
	Improve understanding of the source of SRD pollution by increasing monitoring of Combined Sewer Overflows (CSOs). Expand the network of permanent Event Duration Monitoring (EDM) facilities across the CSOs in Scotland.	Install 31 additional permanent EDM facilities.	Short term (FY 2022/23)	Scottish Water, SEPA
	Continued development of Event Duration Monitoring (EDM) programme, to install permanent EDM facilities in Combined Sewer Overflows (CSOs).	Gather evidence and consider development of 246 permanent EDM facilities locations and consider further monitoring as part of Scottish Water's intelligent networks roll-out.	Short - long term (phased work during 2021-2027)	Scottish Water, SEPA
	Development of screening at Combined Sewer Overflows (CSOs) to reduce the quantity of SRD released during spill events.	29 CSO screens designed and developed.	Short term (2022-2023)	Scottish Water

	<p>Better understand the impact of SRD by carrying out focused Aesthetic and Feasibility Studies in the Glasgow and Paisley/Renfrew catchments. The aim of the studies is to confirm whether an intermittent discharge (ID) is causing aesthetic impacts from SRD pollution and provide indicative solutions to resolve these issues.</p>	<p>Complete five aesthetic studies.</p>	<p>Long term (2021-2027)</p>	<p>Scottish Water</p>
--	---	---	------------------------------	-----------------------

Table A3: Strategic Direction 3 Action Plan

Objective	Action	Deliverable	Timescale	Lead
Reduce the cost of disposal of collected marine litter.	Explore a mechanism to assist communities to reduce costs in disposing of large volumes of collected beach litter.	Information to assist relevant parties (e.g. community groups, NGOs) to dispose of large volumes of beach litter without prohibitive financial costs.	Short - medium term	Scottish Government - Marine Scotland
Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal.	Expansion of the Keep Scotland Beautiful Upstream Battle project or equivalent riverine project.	Three of Scotland's main rivers to be involved in litter projects that include removal and responsible disposal of waste.	Medium term	MLSSG, KSB
Expansion of the Fishing for Litter project.	Promote the Fishing for Litter scheme within the fishing industry and to ports, harbours and fishers not currently participating.	Increase the total number of vessels participating in the FfL schemes in Scotland by 50% by 2025, compared to a baseline situation in 2021. [NB this figure is currently provisional]	Medium term	KIMO International
	Through a (series of) pilot project(s), quantify the practical, economic and logistical challenges of recycling (fouled) marine litter.	Reports from pilot project(s) will detail outcomes and provide suggestions for wider uptake of recycling of marine litter.	Medium term	KIMO International

Support the installation of riverine litter removal technology in the Clyde.	Stage 1: Project to identify sections of the Clyde suitable for boom instalment. Boom to be installed, litter levels monitored, and debris removed.	Litter boom installed, monitored, and a final report delivered.	Medium term	Scottish Government - Marine Scotland, Zero Waste Scotland, Glasgow City Council, SEPA
	Stage 2: Using the outputs from Stage 1, install technologies to remove waste continually in conjunction with boom.	A fully automated litter removal system installed and active in the Clyde.	Medium - long term	Scottish Government - Marine Scotland, Zero Waste Scotland, Glasgow City Council, SEPA

Table A4: Strategic Direction 4 Action Plan

Objective	Action	Deliverable	Timescale	Lead
Use of Fishing for Litter initiative data to evaluate industry engagement.	In alignment with OSPAR's Fishing for Litter guidelines (i) increase engagement in both new and participating harbours to weigh and monitor FfL waste, and (ii) improve the quality of data collection through training and awareness-raising.	Annual project reports will include weighing and monitoring data from participating harbours, where possible.	Short - medium term	KIMO International
Accurate assessments of marine plastics in Scottish waters.	Work with the UK marine litter community and Defra to i) expand OSPAR monitoring beaches to include an open coast northeast beach, and ii) ensure appropriate monitoring data is available to the Quality Status Report 2023 (QSR2023) assessment team.	An accurate OSPAR QSR2023 assessment of regional marine plastics.	Short term	Marine Scotland - Environment Monitoring and Assessment Programme
Development of an agreed methodology for inter-tidal microplastic monitoring.	Work with MASTS and others (Joint Research Council and OSPAR) to contribute to the work to develop a harmonised method for microplastics assessment in sediments. Contribute to the	Joint Research Council microplastics in sediment assessment methodology; and an OSPAR agreed methodology for sediment microplastic monitoring.	Long term	Marine Scotland, Heriot Watt University, MASTS

	development of an OSPAR agreed methodology for sediment microplastic monitoring.			
Social science evaluation of the Marine Litter Strategy	Use of a public attitudes survey to obtain data on how the Scottish public values their marine environment, and what actions they would be willing to take to protect it.	A public attitudes survey report	Long term	Scottish Government Marine Analytical Unit
Understanding Scottish island beach litter	Work with island communities and the Scottish Islands Federation to i) improve monitoring of beach litter on Scottish islands, and ii) understand the sources of marine litter on Scottish island foreshores.	1) To establish an initial pilot study in order to define the issues involved. 2) Using results of pilot study to initiate a Scottish Islands Beach Litter Monitoring Programme.	1) Medium term 2) long term	MLSSG, Marine Scotland

Table A5: Strategic Direction 5 Action Plan

Objective	Action	Deliverables	Timescale	Lead
Expand communications and understanding of Marine Litter Strategy work with delivery partners.	Identify opportunities to engage with relevant authorities and organisations to promote marine litter work.	Attendance at COSLA, islands, Local Coastal Partnership, NGO network, and relevant business events.	Short - long term	MLSSG
Build on and strengthen working relationships with wider UK.	Work with UK Government and Devolved Administrations to share UK-wide approaches on shared issues where appropriate.	Collaborate with UK Government and Devolved Administration colleagues on litter policies relevant to Scotland.	Short - long term	Marine Scotland
Increase engagement with OSPAR (which includes the European Commission) through: participation in and implementation of the Regional Action Plan for Marine Litter; and taking a lead role with relevant actions.	Lead on a relevant task within the updated OSPAR Regional Action Plan on Marine Litter (once published).	Identify a task at the European or international level that would contribute to the work of the Marine Litter Strategy - task lead and publication of papers.	Short - long term	Marine Scotland
	Scotland to be represented at two OSPAR committees: Environmental Impact of Human Activities (EIHA); Hazardous Substances and Eutrophication (HASEC).	Attendance and participation at committee meetings.	Short - long term	Marine Scotland
Strengthen co-ordination across the British-Irish Council region.	Through the role of co-chairing the Marine Litter Working Group, Marine Scotland will identify tasks for collaboration regarding	New joint commitments from British-Irish Council members on marine litter.	Long term	Marine Scotland

	shared marine litter problems.			
--	--------------------------------	--	--	--

Appendix B: Frequency Tables

Strategic Direction 1

Table B1: Encourage positive behaviour and deter littering and flytipping

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	56.1%	30.3%	7.1%	3.9%	1.3%	1.3%
Organisation	40.9%	40.9%	9.1%	6.8%	0.0%	2.3%
Total	52.8%	32.7%	7.5%	4.5%	1.0%	1.5%
Organisation breakdown:						
Coastal development and conservation	50.0%	37.5%	0.0%	12.5%	0.0%	0.0%
Communities	71.4%	14.3%	0.0%	14.3%	0.0%	0.0%
Environmental and conservation	27.3%	45.5%	18.2%	9.1%	0.0%	0.0%
Industry	36.4%	45.5%	9.1%	0.0%	0.0%	9.1%
Other	28.6%	57.1%	14.3%	0.0%	0.0%	0.0%

N=199 (155 individuals and 44 organisations). Excludes all blank or not answered responses.

Table B2: Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	67.1%	21.3%	6.5%	2.6%	1.3%	1.3%
Organisation	56.8%	25.0%	13.6%	2.3%	0.0%	2.3%
Total	64.8%	22.1%	8.0%	2.5%	1.0%	1.5%
Organisation breakdown:						
Coastal development and conservation	62.5%	25.0%	12.5%	0.0%	0.0%	0.0%
Communities	85.7%	0.0%	0.0%	14.3%	0.0%	0.0%
Environmental and conservation	54.5%	27.3%	18.2%	0.0%	0.0%	0.0%
Industry	45.5%	36.4%	9.1%	0.0%	0.0%	9.1%
Other	42.9%	28.6%	28.6%	0.0%	0.0%	0.0%

N=199 (155 individuals and 44 organisations). Excludes blank or not answered responses.

Table B3: Improve waste management for collected marine litter

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	67.1%	21.3%	8.4%	1.9%	0.6%	0.6%
Organisation	54.5%	29.5%	11.4%	2.3%	0.0%	2.3%
Total	64.3%	23.1%	9.0%	2.0%	0.5%	1.0%
Organisation breakdown:						
Coastal development and conservation	62.5%	25.0%	12.5%	0.0%	0.0%	0.0%
Communities	85.7%	0.0%	0.0%	14.3%	0.0%	0.0%
Environmental and conservation	36.4%	54.5%	9.1%	0.0%	0.0%	0.0%
Industry	45.5%	18.2%	27.3%	0.0%	0.0%	9.1%
Other	57.1%	42.9%	0.0%	0.0%	0.0%	0.0%

N=199 (155 individuals and 44 organisations). Excludes blank or not answered responses.

Table B4: Reduce sewage related debris through a behavioural change campaign

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	61.7%	21.4%	11.0%	3.9%	1.9%	0.0%
Organisation	50.0%	39.6%	6.3%	2.1%	2.1%	0.0%
Total	58.9%	25.7%	9.9%	3.5%	2.0%	0.0%
Organisation breakdown:						
Coastal development and conservation	50.0%	37.5%	0.0%	12.5%	0.0%	0.0%
Communities	85.7%	0.0%	0.0%	0.0%	14.3%	0.0%
Environmental and conservation	18.2%	72.7%	9.1%	0.0%	0.0%	0.0%
Industry	60.0%	33.3%	6.7%	0.0%	0.0%	0.0%
Other	42.9%	42.9%	14.3%	0.0%	0.0%	0.0%

N=202 (154 individuals and 48 organisations). Excludes blank or not answered responses.

Table B5: Any Omissions or Gaps in Planned Actions – Strategic Direction 1

Respondent	Yes	No	Don't Know
Individual	48.6%	19.6%	31.8%
Organisation	85.1%	10.6%	4.3%
Total	57.4%	17.4%	25.1%
Organisation breakdown:			
Coastal development and conservation	100.0%	0.0%	0.0%
Communities	100.0%	0.0%	0.0%
Environmental and conservation	100.0%	0.0%	0.0%
Industry	75.0%	12.5%	12.5%
Other	57.1%	42.9%	0.0%

N=195 (148 individuals and 47 organisations). Excludes blank and not answered responses.

Strategic Direction 2

Table B6: Reduce plastic pellet loss into the marine environment

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	66.4%	23.7%	5.3%	2.0%	0.7%	2.0%
Organisation	59.5%	26.2%	4.8%	4.8%	0.0%	4.8%
Total	64.9%	24.2%	5.2%	2.6%	0.5%	2.6%
Organisation breakdown:						
Coastal development and conservation	87.5%	0.0%	0.0%	12.5%	0.0%	0.0%
Communities	57.1%	28.6%	0.0%	14.3%	0.0%	0.0%
Environmental and conservation	63.6%	27.3%	9.1%	0.0%	0.0%	0.0%
Industry	44.4%	22.2%	11.1%	0.0%	0.0%	22.2%
Other	42.9%	57.1%	0.0%	0.0%	0.0%	0.0%

N=194 (152 individuals and 42 organisations). Excludes blank and not answered responses.

Table B7: Improve the ability of the fishing industry to retrieve lost fishing gear from the sea

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	61.8%	22.4%	7.9%	3.9%	2.0%	2.0%
Organisation	50.0%	23.8%	14.3%	2.4%	0.0%	9.5%
Total	59.3%	22.7%	9.3%	3.6%	1.5%	3.6%
Organisation breakdown:						
Coastal development and conservation	75.0%	12.5%	12.5%	0.0%	0.0%	0.0%
Communities	57.1%	28.6%	0.0%	0.0%	0.0%	14.3%
Environmental and conservation	54.5%	9.1%	18.2%	9.1%	0.0%	9.1%
Industry	33.3%	33.3%	11.1%	0.0%	0.0%	22.2%
Other	28.6%	42.9%	28.6%	0.0%	0.0%	0.0%

N=194 (152 individuals and 42 organisations). Excludes blank and not answered responses.

Table B8: Reduce sources of sewage related debris

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	71.3%	18.0%	4.7%	2.7%	1.3%	2.0%
Organisation	52.1%	25.0%	22.9%	0.0%	0.0%	0.0%
Total	66.7%	19.7%	9.1%	2.0%	1.0%	1.5%
Organisation breakdown:						
Coastal development and conservation	87.5%	12.5%	0.0%	0.0%	0.0%	0.0%
Communities	57.1%	42.9%	0.0%	0.0%	0.0%	0.0%
Environmental and conservation	63.6%	18.2%	18.2%	0.0%	0.0%	0.0%
Industry	33.3%	13.3%	53.3%	0.0%	0.0%	0.0%
Other	28.6%	57.1%	14.3%	0.0%	0.0%	0.0%

N=198 (150 individuals and 48 organisations). Excludes blank and not answered responses.

Table B9: Any Omissions or Gaps in Planned Actions – Strategic Direction 2

Respondent	Yes	No	Don't Know
Individual	44.1%	20.7%	35.2%
Organisation	77.6%	14.3%	8.2%
Total	52.6%	19.1%	28.4%
Organisation breakdown:			
Coastal development and conservation	100.0%	0.0%	0.0%
Communities	71.4%	14.3%	14.3%
Environmental and conservation	90.9%	0.0%	9.1%
Industry	68.8%	18.8%	12.5%
Other	57.1%	42.9%	0.0%

N=194 (145 individuals and 49 organisations). Excludes blank and not answered responses.

Strategic Direction 3

Table B10: Reduce the cost of disposal of collected marine litter

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	58.7%	26.0%	10.7%	2.0%	0.7%	2.0%
Organisation	59.5%	23.8%	9.5%	4.8%	0.0%	2.4%
Total	58.9%	25.5%	10.4%	2.6%	0.5%	2.1%
Organisation breakdown:						
Coastal development and conservation	87.5%	12.5%	0.0%	0.0%	0.0%	0.0%
Communities	71.4%	0.0%	14.3%	14.3%	0.0%	0.0%
Environmental and conservation	54.5%	27.3%	18.2%	0.0%	0.0%	0.0%
Industry	33.3%	44.4%	11.1%	0.0%	0.0%	11.1%
Other	57.1%	28.6%	0.0%	14.3%	0.0%	0.0%

N=192 (150 individuals and 42 organisations). Excludes blank and not answered responses.

Table B11: Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	62.7%	29.3%	5.3%	2.0%	0.0%	0.7%
Organisation	45.5%	43.2%	9.1%	0.0%	0.0%	2.3%
Total	58.8%	32.5%	6.2%	1.5%	0.0%	1.0%
Organisation breakdown:						
Coastal development and conservation	50.0%	50.0%	0.0%	0.0%	0.0%	0.0%
Communities	85.7%	0.0%	14.3%	0.0%	0.0%	0.0%
Environmental and conservation	45.5%	45.5%	9.1%	0.0%	0.0%	0.0%
Industry	36.4%	36.4%	18.2%	0.0%	0.0%	9.1%
Other	14.3%	85.7%	0.0%	0.0%	0.0%	0.0%

N=194 (150 individuals and 44 organisations). Excludes blank and not answered responses.

Table B12: Expansion of the Fishing for Litter project

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	63.1%	28.2%	4.7%	2.0%	0.7%	1.3%
Organisation	56.8%	27.3%	11.4%	2.3%	0.0%	2.3%
Total	61.7%	28.0%	6.2%	2.1%	0.5%	1.6%
Organisation breakdown:						
Coastal development and conservation	62.5%	25.0%	0.0%	12.5%	0.0%	0.0%
Communities	85.7%	0.0%	14.3%	0.0%	0.0%	0.0%
Environmental and conservation	63.6%	18.2%	18.2%	0.0%	0.0%	0.0%
Industry	36.4%	45.5%	9.1%	0.0%	0.0%	9.1%
Other	42.9%	42.9%	14.3%	0.0%	0.0%	0.0%

N=193 (149 individuals and 44 organisations). Excludes blank and not answered responses.

Table B13: Installation of riverine litter removal technology in the River Clyde

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	60.7%	26.0%	8.7%	1.3%	0.0%	3.3%
Organisation	47.7%	29.5%	11.4%	2.3%	0.0%	9.1%
Total	57.7%	26.8%	9.3%	1.5%	0.0%	4.6%
Organisation breakdown:						
Coastal development and conservation	37.5%	37.5%	12.5%	0.0%	0.0%	12.5%
Communities	85.7%	0.0%	0.0%	0.0%	0.0%	14.3%
Environmental and conservation	54.5%	45.5%	0.0%	0.0%	0.0%	0.0%
Industry	45.5%	18.2%	27.3%	0.0%	0.0%	9.1%
Other	14.3%	42.9%	14.3%	14.3%	0.0%	14.3%

N=194 (150 individuals and 44 organisations). Excludes blank and not answered responses.

Table B14: Any Omissions or Gaps in Planned Actions – Strategic Direction 3

Respondent	Yes	No	Don't Know
Individual	29.6%	31.7%	38.7%
Organisation	64.4%	20.0%	15.6%
Total	38.0%	28.9%	33.2%
Organisation breakdown:			
Coastal development and conservation	100.0%	0.0%	0.0%
Communities	85.7%	0.0%	14.3%
Environmental and conservation	81.8%	9.1%	9.1%
Industry	33.3%	41.7%	25.0%
Other	28.6%	42.9%	28.6%

N=187 (142 individuals and 45 organisations). Excludes blank and not answered responses.

Strategic Direction 4

Table B15: Use of fishing for litter initiative data to evaluate industry engagement

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	55.0%	34.2%	6.7%	1.3%	0.0%	2.7%
Organisation	38.1%	35.7%	19.0%	4.8%	0.0%	2.4%
Total	51.3%	34.6%	9.4%	2.1%	0.0%	2.6%
Organisation breakdown:						
Coastal development and conservation	62.5%	12.5%	12.5%	12.5%	0.0%	0.0%
Communities	57.1%	28.6%	14.3%	0.0%	0.0%	0.0%
Environmental and conservation	36.4%	36.4%	18.2%	9.1%	0.0%	0.0%
Industry	11.1%	55.6%	22.2%	0.0%	0.0%	11.1%
Other	28.6%	42.9%	28.6%	0.0%	0.0%	0.0%

N=191 (149 individuals and 42 organisations). Excludes blank and not answered responses.

Table B16: Accurate assessments of marine plastics in Scottish waters

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	63.3%	25.3%	6.0%	0.7%	1.3%	3.3%
Organisation	54.5%	22.7%	11.4%	4.5%	0.0%	6.8%
Total	61.3%	24.7%	7.2%	1.5%	1.0%	4.1%
Organisation breakdown:						
Coastal development and conservation	62.5%	0.0%	12.5%	12.5%	0.0%	12.5%
Communities	71.4%	28.6%	0.0%	0.0%	0.0%	0.0%
Environmental and conservation	54.5%	27.3%	9.1%	9.1%	0.0%	0.0%
Industry	54.5%	18.2%	18.2%	0.0%	0.0%	9.1%
Other	28.6%	42.9%	14.3%	0.0%	0.0%	14.3%

N=194 (150 individuals and 44 organisations). Excludes blank and not answered responses.

Table B17: Development of an agreed methodology for inter-tidal microplastic monitoring

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	57.7%	26.8%	9.4%	2.0%	0.0%	4.0%
Organisation	45.5%	31.8%	18.2%	2.3%	0.0%	2.3%
Total	54.9%	28.0%	11.4%	2.1%	0.0%	3.6%
Organisation breakdown:						
Coastal development and conservation	62.5%	0.0%	25.0%	12.5%	0.0%	0.0%
Communities	71.4%	28.6%	0.0%	0.0%	0.0%	0.0%
Environmental and conservation	54.5%	27.3%	18.2%	0.0%	0.0%	0.0%
Industry	18.2%	54.5%	18.2%	0.0%	0.0%	9.1%
Other	28.6%	42.9%	28.6%	0.0%	0.0%	0.0%

N=193 (149 individuals and 44 organisations). Excludes blank and not answered responses.

Table B18: Social science evaluation of the Marine Litter Strategy

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	57.3%	26.7%	11.3%	1.3%	0.0%	3.3%
Organisation	43.2%	29.5%	18.2%	2.3%	0.0%	6.8%
Total	54.1%	27.3%	12.9%	1.5%	0.0%	4.1%
Organisation breakdown:						
Coastal development and conservation	62.5%	12.5%	12.5%	0.0%	0.0%	12.5%
Communities	71.4%	14.3%	14.3%	0.0%	0.0%	0.0%
Environmental and conservation	45.5%	36.4%	18.2%	0.0%	0.0%	0.0%
Industry	18.2%	45.5%	18.2%	9.1%	0.0%	9.1%
Other	28.6%	28.6%	28.6%	0.0%	0.0%	14.3%

N=194 (150 individuals and 44 organisations). Excludes blank and not answered responses.

Table B19: An understanding of Scottish island beach litter

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	61.1%	30.2%	4.7%	0.7%	0.7%	2.7%
Organisation	54.5%	29.5%	13.6%	0.0%	0.0%	2.3%
Total	59.6%	30.1%	6.7%	0.5%	0.5%	2.6%
Organisation breakdown:						
Coastal development and conservation	75.0%	12.5%	12.5%	0.0%	0.0%	0.0%
Communities	71.4%	14.3%	14.3%	0.0%	0.0%	0.0%
Environmental and conservation	72.7%	18.2%	9.1%	0.0%	0.0%	0.0%
Industry	27.3%	45.5%	18.2%	0.0%	0.0%	9.1%
Other	28.6%	57.1%	14.3%	0.0%	0.0%	0.0%

N=193 (149 individuals and 44 organisations). Excludes blank and not answered responses.

Table B20: Any Omissions or Gaps in Planned Actions – Strategic Direction 4

Respondent	Yes	No	Don't Know
Individual	28.9%	29.6%	41.5%
Organisation	52.3%	34.1%	13.6%
Total	34.6%	30.7%	34.6%
Organisation breakdown:			
Coastal development and conservation	100.0%	0.0%	0.0%
Communities	71.4%	28.6%	0.0%
Environmental and conservation	54.5%	18.2%	27.3%
Industry	25.0%	58.3%	16.7%
Other	28.6%	57.1%	14.3%

N=179 (135 individuals and 44 organisations). Excludes blank and not answered responses.

Strategic Direction 5

Table B21: Expand communications and understanding of Marine Litter Strategy work with delivery partners

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	56.5%	34.7%	6.1%	0.0%	0.0%	2.7%
Organisation	50.0%	31.8%	9.1%	4.5%	0.0%	4.5%
Total	55.0%	34.0%	6.8%	1.0%	0.0%	3.1%
Organisation breakdown:						
Coastal development and conservation	57.1%	28.6%	0.0%	14.3%	0.0%	0.0%
Communities	57.1%	28.6%	0.0%	0.0%	0.0%	14.3%
Environmental and conservation	63.6%	27.3%	9.1%	0.0%	0.0%	0.0%
Industry	41.7%	33.3%	16.7%	0.0%	0.0%	8.3%
Other	28.6%	42.9%	14.3%	14.3%	0.0%	0.0%

N=191 (147 individuals and 44 organisations). Excludes blank and not answered responses.

Table B22: Build on and strengthen working relationships with wider UK

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	57.5%	26.0%	11.6%	2.1%	0.0%	2.7%
Organisation	50.0%	31.8%	11.4%	4.5%	0.0%	2.3%
Total	55.8%	27.4%	11.6%	2.6%	0.0%	2.6%
Organisation breakdown:						
Coastal development and conservation	57.1%	28.6%	0.0%	14.3%	0.0%	0.0%
Communities	57.1%	28.6%	0.0%	0.0%	0.0%	14.3%
Environmental and conservation	72.7%	18.2%	9.1%	0.0%	0.0%	0.0%
Industry	33.3%	41.7%	25.0%	0.0%	0.0%	0.0%
Other	28.6%	42.9%	14.3%	14.3%	0.0%	0.0%

N=190 (146 individuals and 44 organisations). Excludes blank and not answered responses.

Table B23: Increase engagement with OSPAR through: participation in and implementation of the Regional Action Plan for Marine Litter; and taking a lead role with relevant actions

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	55.6%	27.1%	11.1%	0.0%	0.0%	6.3%
Organisation	39.5%	34.9%	16.3%	2.3%	0.0%	7.0%
Total	51.9%	28.9%	12.3%	0.5%	0.0%	6.4%
Organisation breakdown:						
Coastal development and conservation	57.1%	28.6%	14.3%	0.0%	0.0%	0.0%
Communities	57.1%	28.6%	0.0%	0.0%	0.0%	14.3%
Environmental and conservation	63.6%	9.1%	27.3%	0.0%	0.0%	0.0%
Industry	9.1%	54.5%	18.2%	0.0%	0.0%	18.2%
Other	14.3%	57.1%	14.3%	14.3%	0.0%	0.0%

N=187 (144 individuals and 43 organisations). Excludes blank and not answered responses.

Table B24: Strengthen co-ordination across the British-Irish Council region

Respondent	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Individual	59.0%	26.4%	11.1%	0.0%	0.7%	2.8%
Organisation	41.9%	34.9%	14.0%	2.3%	2.3%	4.7%
Total	55.1%	28.3%	11.8%	0.5%	1.1%	3.2%
Organisation breakdown:						
Coastal development and conservation	57.1%	28.6%	0.0%	0.0%	14.3%	0.0%
Communities	57.1%	28.6%	0.0%	0.0%	0.0%	14.3%
Environmental and conservation	63.6%	18.2%	18.2%	0.0%	0.0%	0.0%
Industry	9.1%	54.5%	27.3%	0.0%	0.0%	9.1%
Other	28.6%	42.9%	14.3%	14.3%	0.0%	0.0%

N=187 (144 individuals and 43 organisations). Excludes blank and not answered responses.

Table B25: Any Omissions or Gaps in Planned Actions – Strategic Direction 5

Respondent	Yes	No	Don't Know
Individual	20.4%	33.6%	46.0%
Organisation	50.0%	29.5%	20.5%
Total	27.6%	32.6%	39.8%
Organisation breakdown:			
Coastal development and conservation	100.0%	0.0%	0.0%
Communities	14.3%	28.6%	57.1%
Environmental and conservation	72.7%	18.2%	9.1%
Industry	38.5%	46.2%	15.4%
Other	28.6%	42.9%	28.6%

N=181 (137 individuals and 43 organisations). Excludes blank and not answered responses.

Business and Regulatory Impact Assessment

Table B26: Will proposals have implications for you or your business

Respondent	Yes	No	Don't Know
Individual	15.8%	48.1%	36.1%
Organisation	46.3%	19.5%	34.1%
Total	23.0%	41.4%	35.6%
Organisation breakdown:			
Coastal development and conservation	57.1%	0.0%	42.9%
Communities	20.0%	40.0%	40.0%
Environmental and conservation	63.6%	9.1%	27.3%
Industry	50.0%	16.7%	33.3%
Other	16.7%	50.0%	33.3%

N= 174 (133 individuals and 41 organisations). Excludes blank and not answered responses.

Appendix C: Campaign Responses

Based on a review of consultation responses there would appear to be some examples of campaign responses received.

Standard Campaign Response

First, there are 21 identical responses in the Final Comments section of the consultation. This relates to submissions by 19 individuals and two organisations who inserted the following text:

“I support a ban on wet wipes containing plastic. But, simply substituting plastic with another single-use material will not be enough by itself. We also need to support consumers to move to reusable products and apply EPR (where companies would pay the full costs of their product disposal including clean ups) to all other single-use wet wipes. These measures should be applied to all sanitary items which have similar issues and solutions. In the long term we want to see action at a larger scale, there is no longer time to solve the plastics crisis item by item, we need systemic change to move to a reusable and circular economy.”

19 individuals, Chocolate Tree Limited, and Laudato Si Animators (Scotland).

Non-Standard Campaign Response

Both Marine Conservation Society and Fidra signed up to the Scottish Environment LINK co-ordinated response, as well as each submitting a separate organisation response to the consultation.

There are a few examples where individual respondent(s) have submitted identical or similar responses to certain open-ended question(s), or responses similar to the Scottish Islands Federation, Small Isles Community Council, and/or Community of Arran Seabed Trust responses.

Appendix D: Organisation Groupings

Table D1: Organisation Groupings

Coastal Development and Conservation	<p>Community of Arran Seabed Trust Islay Development Initiative Isle of Canna Community Development Trust Moray Firth Coastal Partnership Scottish Islands Federation (SIF) Small Isles Community Council Solway Firth Partnership Think About Plastic - Arran (TAP)</p>
Communities	<p>Dumfries and Galloway Eco Warriors (beach cleaning group) Friends of Dumbarton Foreshore Friends of River Leven Valley Litter Pick Groups OceanGives ONUS South West Scotland (ONUS SWSCOTLAND) - voluntary beach clean group Organic Growers of Fairlie Plastic Free Helensburgh (a SAS accredited plastic free town)</p>
Environmental and Conservation	<p>East Haven Together and Angus Clean Environments Fidra Forth Rivers Trust Keep Scotland Beautiful KIMO UK Marine Conservation Society (MCS) Plastic@Bay River Clyde Environmental Group Scottish Environment LINK Scottish Environment Protection Agency (SEPA) Skye Tidy Tidelines Whale and Dolphin Conservation</p>
Industry	<p>Berry Global British Marine Scotland Chartered Institution of Wastes Management Scotland (CIWM Scotland) Chocolate Tree Ltd Cosmetic, Toiletry & Perfumery Association (CTPA) EDANA, the international industry association representing the nonwovens and related industries Fishing Forward UK GamaHealthcare Ltd Law Society of Scotland Nice-Pak International Ltd Port of Milford Haven Red Rock Power Salmon Scotland Scottish Fishermen's Federation Scottish Sea Farms Shetland Fishermen's Association The UK Cleaning Products Industry Association (UKCPI). The Safer Disinfectant Network (SDN)</p>

Table D1: Organisation Groupings (cont'd)

	UK and Ireland Spill Association
Other	Aberdeenshire Sailing Trust Advisory Committee on Packaging Argyll & Bute Council Crown Estate Scotland Laudato Si Animators – Scotland Moray Council Royal Yachting Association Scotland Scottish Water

Appendix E: Publication of Responses

The lists below provide details of respondents that indicated that their response should be published (with or without the named contact of who submitted the response). All other respondents selected Do Not Publish Response.

Publish Response Only (Without Name)

In addition to the 19 organisations below, 96 individuals selected this option.

British Marine Scotland
CIWM Scotland
Crown Estate Scotland
EDANA
Fidra
Fishing Forward UK
GamaHealthcare Ltd
Isle of Canna Community Development Trust
Marine Conservation Society
Moray Firth Coastal Partnership
Nice-Pak International Ltd
ONUS SWSCOTLAND
Royal Yachting Association Scotland
Scottish Fishermen's Federation
Scottish Water
SEPA
Skye Tidy Tidelines
The Safer Disinfectant Network
The UK Cleaning Products Industry Association

Publish Response Only (with Name)

In addition to the 31 organisations below, 50 individuals selected this option.

Aberdeenshire Sailing Trust
Advisory Committee on Packaging
Argyll and Bute Council
Berry Global
Chocolate Tree Ltd
Community of Arran Seabed Trust
Cosmetic, Toiletry & Perfumery Association
Dumfries and Galloway Eco Warriors
East Haven Together and Angus Clean Environments
Friends of Dumbarton Foreshore
Friends of River Leven Valley Litter Pick Groups
Islay Development Initiative
Keep Scotland Beautiful
KIMO UK
Laudato Si Animators – Scotland
Law Society of Scotland

Moray Council
OceanGives
Organic Growers of Fairlie
Plastic@Bay
Plastic Free Helensburgh
Red Rock Power
River Clyde Environmental Group
Salmon Scotland
Scottish Environment LINK
Scottish Islands Federation
Shetland Fishermen's Association
Small Isles Community Council
Solway Firth Partnership
Think About Plastic - Arran
UK and Ireland Spill Association

Appendix F: Satisfaction with Consultation

Table F1: Satisfaction with this consultation

	Individuals	Organisations	Total
Very satisfied	38.7%	37.5%	38.4%
Slightly satisfied	26.0%	25.0%	25.8%
Neither satisfied nor dissatisfied	24.7%	25.0%	24.7%
Slightly dissatisfied	6.7%	10.0%	7.4%
Very dissatisfied	4.0%	2.5%	3.7%

N= 190 (150 individuals and 40 organisations)

Table F2: Satisfaction with using the Citizen Space platform to respond to this consultation

	Individuals	Organisations	Total
Very satisfied	50.0%	48.7%	49.7%
Slightly satisfied	24.7%	15.4%	22.7%
Neither satisfied nor dissatisfied	16.4%	25.6%	18.4%
Slightly dissatisfied	4.8%	7.7%	5.4%
Very dissatisfied	4.1%	2.6%	3.8%

N=185 (146 individuals and 39 organisations)

Appendix G: Marine Scotland Directorate Response

This report was prepared by EKOS using the responses from the public consultation, and quoting a sample of the comments received. All received comments were then reviewed separately by Marine Scotland Directorate, and will be taken into consideration while the Marine Litter Strategy and Action Plan is finalised.

The draft Action Plan that was put out for consultation was produced in collaboration with the Marine Litter Strategy Steering Group and relevant stakeholders. Individual actions, deliverables, timescales (short, medium, or long term), and responsible lead organisations were all given careful consideration with respect to a variety of pressures. These included: organisational plans and available resources (staff time and financial) of the responsible leads; the Scottish Government's possession of devolved powers to progress new legislation; the ability of responsible leads to contribute to new processes, including within the EU; and the ability to utilise novel approaches to hitherto unresolved issues.

To illustrate this, some explanations are given below relating to actions where large volumes of comments or alternative actions had been suggested via the consultation:

- A large number of comments were received on littering, flytipping, and land-based litter. These were all passed to the policy team updating the National Litter and Flytipping Strategy for their consideration.
- Actions on waste from the fishing and aquaculture sectors have been aligned to the EU directives on Single-use Plastics and Port Reception Facilities, and to planned work of the European Committee for Standardisation (CEN).
- Actions regarding retrieval of lost fishing gear will be addressed through contributing to the planned work of CEN. This is in addition to work Scottish Government is already conducting on this issue.
- Following the introduction of the UK Internal Market Act 2020, the new legislative landscape means Scottish Government will consider, with the other UK administrations, future options on reducing sewage related debris items as sources of marine litter.
- Following a Scottish, and more recently a UK call for evidence, the Scottish Government is working with the UK Government and other Devolved Administrations to determine the best means of reducing plastic wet wipes as a source of marine litter. The UK-wide responses suggested that some alternative wet wipes to the market may still risk environmental health and sewer blockages. We will continue to work across our policy areas of zero waste, water quality and water industry to reach a solution.
- Each Local Authority decides how to spend their budget, and how that is allocated across waste and cleaning services, including that relating to beach cleaning. There are other mechanisms Scottish Government intend to explore to potentially reduce costs related to such activities where excessive volumes of collected beach litter need to be disposed.
- Many of Scotland's islands face unique challenges in dealing with marine litter that arrives on their shores, much of which derives from marine activities in the Atlantic Ocean rather than land-based sources. The actions on island litter intend to initiate novel research into these specific issues.

The vast majority of respondents (both individuals and organisations) agreed (i.e. agreed or strongly agreed) that the planned actions under each of the five Strategic Directions would contribute to the successful implementation of the Strategy. The substance of these actions will not therefore be altered. However, all consultation responses will be taken into consideration in order to make appropriate adjustments to the wording of actions or to update actions where responsible lead organisations have made progress.



Scottish Government
Riaghaltas na h-Alba
gov.scot

© Crown copyright 2022

OGL

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-80435-799-6 (web only)

Published by The Scottish Government, August 2022

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1131622 (08/22)

W W W . g o v . s c o t