

Marine Litter Strategy Consultation

December 2021

Introduction to the Consultation

This consultation is one of the final stages in the process of updating the Marine Litter Strategy for Scotland. A large amount of work has already been undertaken with guidance from the Marine Litter Strategy Steering Group. Membership of the Marine Litter Strategy Steering Group includes representatives from academia, environmental charities and non-governmental organisations, terrestrial litter interests, the fishing industry, and public bodies that have responsibility for dealing with pollution in our waterways.

Marine Scotland is leading this work and we are now seeking input from the public and other organisations to finalise the strategy and action plan before it is published.

We have gone through various stages of engagement with partners and stakeholders.

The first stage was to review the original strategy, and agree that the overall aims and intent of the strategy were still valid and relevant, and that the strategic directions (objectives) were considering the correct issues. These workshops took place in late 2019 and identified the need for changes in a refreshed strategy. Work was paused in 2020 due to the Coronavirus pandemic.

In 2021, we worked with partners and stakeholders to consider which areas were of most concern and what specific actions we could take to effect a positive change. These online meetings were held during Summer 2021, with further input gathered in Autumn 2021.

These actions have been agreed as work that can be realistically achieved within the next six years, bearing in mind the staff and monetary resources that we and our partners have available. Each action has a timeframe, a responsible lead organisation, and a tangible output that can be measured. This is so we can demonstrate progress, transparency and accountability.

The action plan can be viewed in Part 4 (Strategic Directions and Actions) of this consultation paper. The plan can also be viewed as an Excel document in the Supporting Documents section on this consultation's page on the Scottish Government consultation website.

The purpose of this consultation is not to repeat the earlier engagement process progressed by the Marine Litter Strategy Steering Group. Rather, it seeks wide-ranging views on the range of actions that have been identified as priorities to guide our work over the next six years.

Analysis of consultation responses will ensure the right final approach, and will be used to finalise the Marine Litter Strategy and Action Plan.

The consultation contains 12 questions, and these can be found in Part 4 of this document.

Other Relevant Consultations

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 this terrestrial strategy and action plan will directly impact on marine litter levels. A consultation on the National Litter and Flytipping Strategy is open until 31 March 2022 and you may also wish to respond to this. You can do so at [National litter and flytipping strategy consultation - Scottish Government - Citizen Space](#)

A Marine Litter Strategy for Scotland

Executive Summary

The marine litter strategy has a clear purpose: to develop current and future measures to prevent litter from entering the marine and coastal environment, and to support its removal, in order to bring ecological, economic and social benefits.

The aim of the strategy is 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'. This underpins developments in marine legislation through the Marine (Scotland) Act 2010 in promoting sustainable use of our valuable and unique environment.

The implementation and progression of the strategy will continue to be led by Marine Scotland, in a co-ordinating role. It is recognised that responsibility for delivery is shared across local and national government, business, environmental and community groups, and private individuals.

The strategy builds on work and initiatives already underway, involving individuals, organisations, groups, and communities in caring for their 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 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.

With these fundamental issues paramount, the marine litter strategy sets out five strategic directions and a range of measures to help deliver the strategy:

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.

Action will include:

- 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.

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.

Action will include:

- Considering a range of policy options to reduce sources of sewage-related debris.

- Contributing to the development of an international plastic pellet certification scheme.

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

Action will include:

- 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.

Strategic Direction 4 – Improve monitoring at a Scottish scale and develop measures for strategy evaluation.

Action will include:

- 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.

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

Action will include:

- Strengthening working relationships with UK, regional, and international partners, to contribute to future work and share best practice.

This is a long term strategy which will undergo periodical review. The objectives and actions underpinning the strategy will necessarily be achieved in the short, medium or long term, depending on the degree of complexity and collaboration required. All actions have measurable outcomes so progress can be monitored throughout. During the strategy's lifetime these actions will be reviewed, allowing for adjustments, so that we can be confident we are making a positive difference through this work.

1. Introduction

Definition of marine litter

1.1 Marine litter is any persistent, manufactured or processed solid material discarded, disposed of, or abandoned in the marine and coastal environment. Marine litter consists of items that have been made or used by people and deliberately discarded or unintentionally lost into the sea or coastline, including such materials transported into the marine environment from land by rivers, drainage or sewerage systems, or by wind. Typical examples are plastics, wood, metals, glass, rubber, clothing and paper. This definition does not include semi-solid remains of, for example, mineral and vegetable oils, paraffin and chemicals that sometimes litter the sea and shores¹.

Background

1.2 Marine litter poses a number of problems across the economy, environment and society. These detrimental effects include damage to marine wildlife, as well as wider ecosystem deterioration, public health issues, impacts on aesthetics, and a wider range of economic impacts across industries reliant on our coastal and marine environment.

1.3 Marine litter threatens the realisation of a shared vision for 'clean, healthy, safe, productive, and biologically diverse marine and coastal environments, managed to meet the long term needs of nature and people'. It may also impact upon Scotland's strategic objectives, most notably the drive to become a greener, wealthier and fairer, safer and stronger, and healthier Scotland. It is essential that Scotland's marine and coastal resource is protected from the damage caused by marine litter.

1.4 The first cycle of the Marine Litter Strategy for Scotland was consulted upon in July to September 2013, and a final version of the strategy was published in August 2014.

1.5 This updated draft of the Marine Litter Strategy has been published for consultation from 29 December 2021 to 22 March 2022. Responses received will be considered and any necessary amendments will be incorporated into the final strategy.

1.6 This updated strategy reflects on progress made since 2014, and the continuing and new actions necessary to meet our vision and goals. The strategy sets out Scotland's approach to ensuring that measurable steps are taken to reduce sources of marine litter as well as to support removal initiatives, in order to bring ecological, economic and social benefits.

1.7 There are a wide scope of actions currently underway that contribute to the strategy. Many of these initiatives are conducted by volunteers, Non-Governmental Organisations (NGOs), industry and government agencies. This work makes a vital

¹ Marine Strategy Framework Directive – Task Group 10 Report Marine Litter

contribution, and its continuation is intrinsic to the strategy. The action plan that accompanies this cycle of the strategy (Annex A) is limited to new and high priority actions only. We acknowledge the breadth of work already underway, and focus the efforts of this cycle of the strategy on taking additional steps in new areas of work, to extend positive action to further reduce marine litter.

1.8 Embedded in the strategy are the objectives of working towards the Scottish Government's goals of becoming a net zero nation, achieving a circular economy where waste is treated as a resource, enhancing the marine environment through actions relating to the blue economy, and reducing human impact on the environment. Notwithstanding the UK's exit from the EU, Scotland continues to strive to meet or exceed EU targets, including those relating to marine litter.

Current activity

1.9 A range of legislation and regulatory tools exist to inform and implement a Scottish marine litter strategy from the national, regional, and international scales. These include, but are not limited to:

- International Convention for the Prevention of Pollution from Ships (MARPOL). In particular Annex V Prevention of Pollution by Garbage from Ships²;
- EU Marine Strategy Framework Directive³;
- EU Directive on Port Reception Facilities for Ship-generated Waste and Cargo Residues⁴;
- The Bathing Waters (Scotland) Regulations 2008⁵;
- EU Water Framework Directive⁶;
- Environmental Protection Act 1990⁷;
- The Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulations 2003⁸;
- Marine (Scotland) Act 2010⁹. The management of litter, while not directly specified under the Act, falls under the scope of marine planning;
- The Waste (Scotland) Regulations 2012¹⁰;
- EU Urban Waste Water Treatment Directive¹¹;
- The Marine Strategy Regulations 2010¹²

² [International Convention for the Prevention of Pollution from Ships \(MARPOL\)](#).

³ [EU Marine Strategy Framework Directive](#)

⁴ [EU Directive on Port Reception Facilities](#)

⁵ [The Bathing Waters \(Scotland\) Regulations 2008](#)

⁶ [EU Water Framework Directive](#)

⁷ [Environmental Protection Act 1990](#)

⁸ [Port Waste Reception Facilities Regulations 2003](#)

⁹ [Marine \(Scotland\) Act 2010](#)

¹⁰ [The Waste \(Scotland\) Regulations 2012](#)

¹¹ [EU Urban Waste Water Treatment Directive](#)

¹² [The Marine Strategy Regulations 2010](#)

- UK Marine Strategy. This strategy comprises Parts One¹³, Two¹⁴ and Three¹⁵: updates to Parts One¹⁶ and Two¹⁷ have been published in October 2019 and March 2021, respectively; and an update to Part Three is due to be published in Spring 2022;
- OSPAR North-East Atlantic Environment Strategy¹⁸;
- United Nations Sustainable Development Goal 14¹⁹: to ‘conserve and sustainably use the oceans, seas and marine resources for sustainable development’;
- EU Single Use Plastic Directive²⁰;
- The Merchant Shipping (Prevention of Pollution by Garbage from Ships) Regulations 2020²¹

1.10 The Scottish Government’s first National Litter Strategy ‘Towards a Litter-Free Scotland’²² was published in June 2014. The National Litter Strategy is being refreshed as a National Litter and Flytipping Strategy, recognising that these are separate issues and require a tailored approach to each. This updated strategy focuses on three key themes: behaviour change, services and infrastructure, and enforcement. It has strong links with the marine litter strategy as its success will result in a reduction of land based litter which can enter our seas.

The UK Marine Strategy

1.11 The Marine Strategy Regulations 2010 are the main driver for addressing the problem of marine and coastal litter within Scotland and the UK as a whole. The Regulations require the four UK administrations to produce a joint Marine Strategy with the overall aim of achieving or maintaining Good Environmental Status (GES) in our seas. Given the cross-boundary nature of issues such as marine litter we must also co-operate with other countries sharing our seas.

1.12 The UK Marine Strategy is split into three parts which are required to be reviewed and updated every six years. The first cycle was published between 2012 and 2015:

- Part One: this provides an assessment of UK marine waters, sets objectives for GES, and outlines targets and indicators to measure progress towards GES (update published in October 2019);
- Part Two: this sets out the monitoring programmes we will use to monitor our progress against the targets and indicators set out in Part One (update published in March 2021);
- Part Three: this sets out a programme of measures and actions we will take to achieve or maintain GES (update due to be published in Spring 2022).

¹³ [UK Marine Strategy Part One](#)

¹⁴ [UK Marine Strategy Part Two](#)

¹⁵ [UK Marine Strategy Part Three](#)

¹⁶ [UK Marine Strategy Part One updated](#)

¹⁷ [UK Marine Strategy Part Two updated](#)

¹⁸ [OSPAR North-East Atlantic Environment Strategy](#)

¹⁹ [United Nations Sustainable Development Goal 14](#)

²⁰ [EU Single Use Plastic Directive](#)

²¹ [The Merchant Shipping \(Prevention of Pollution by Garbage from Ships\) Regulations 2020](#)

²² [National Litter Strategy ‘Towards a Litter-Free Scotland’](#)

1.13 For ease, the UK Marine Strategy defines GES in terms of 11 descriptors, one of which relates to marine litter. The high level objective for Descriptor 10 requires that ‘the amount of litter and associated degradation products is reducing, and levels do not pose a significant risk to the environment and marine life’.

1.14 This objective recognises the limitations in data currently available to support a target for a specific percentage reduction in coastal litter and, based on current expert advice, has been included in the UK’s set of GES targets. Table 1 describes the targets and indicators for 2018-2024.

Descriptor 10 Marine Litter: Perspective for 2018 to 2024		
High level objective for GES	The amount of litter and its degradation products on coastlines and in the marine environment is reducing and levels do not pose a significant risk to the environment and marine life.	
Criteria and targets for measuring progress towards GES in future	Presence of litter (beaches)	A decrease in the total amount of the most common categories of litter found on surveyed beaches.
	Presence of litter (seabed)	A decrease in the number of items of litter on the seabed.
	Presence of floating litter	A downward trend in the number of northern fulmars with more than 0.1 g of plastic particles in their stomach.
	Presence of micro-litter	Develop an appropriate indicator to measure micro-litter in the marine environment.
Operational targets	<p>We will work nationally and with other countries in OSPAR to:</p> <p>a) establish the feasibility of setting appropriate reduction targets and/or threshold values for litter on beaches, on the sea floor, sea surface, and microplastics, taking into account regional or sub-regional specificities;</p> <p>b) develop an indicator for micro-litter in sediment;</p> <p>c) establish, if practicable, whether the amount of litter and micro-litter ingested by marine animals adversely affects the health of the species concerned; and</p> <p>d) develop appropriate measures to reduce litter types harmful to the marine environment.</p>	
Indicators to be used to assess the status	<ul style="list-style-type: none"> • Beach litter surveys - OSPAR • Floating litter using plastic in fulmar stomachs - OSPAR • Seafloor litter surveys - OSPAR 	

Table 1: UK Marine Strategy Part One updated targets and indicators for Descriptor 10

1.15 The updated Part One acknowledges that, whilst progress has been made on tackling marine litter, measures need longer to take affect and as a consequence it is considered that GES has not yet been achieved for marine litter.

2. Overview of the Strategy

Aim and Objectives

2.1 The aim of the 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.

2.2 The strategy builds on the huge amount of valuable work already underway at the local, national, regional, and international level, bringing it together to add greater co-ordination of efforts. We recognise that a large volume of this work, in particular marine litter removal, is undertaken voluntarily by individuals, local initiatives, community groups, and NGOs.

Vision

2.3 The vision for the strategy is to: reinforce support for existing actions which are currently contributing to our goals; and identify new measurable and achievable actions which can be completed within a realistic timescale. These actions are focused on: preventing litter entering the marine environment, in parallel with litter reduction and behaviour change actions to be achieved by the National Litter and Flytipping Strategy; continuing to support and raise awareness of actions to remove marine litter; and contributing to the overall aim of achieving GES as required by the UK Marine Strategy.

2.4 Our vision for this lifecycle of the 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, as well as through collaborative work with partners at all levels.

Strategic Directions

2.5 The vision links to five strategic directions and associated actions. The strategic directions are:

- 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.
- 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.
- Strategic Direction 3 – Support the removal of marine litter from the marine and coastal environment.
- Strategic Direction 4 – Improve monitoring at a Scottish scale and develop measures for strategy evaluation.

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

2.6 An overview of actions are detailed within the strategic directions at Part 4. A more detailed action plan, with objectives, deliverables and measurable actions is attached at Annex A. The actions have been planned as either short, medium, or long term within the six year lifespan of the strategy. The planned actions have been agreed within the context of available funding and capacity. The timescales have been allocated with regard to a realistic timeframe, depending on the complexity of the work required to complete the action.

2.7 It is acknowledged that many current initiatives and projects contribute to more than one strategic direction within the strategy. Any such projects that have been named in Part 4 have been placed under the strategic direction to which each project contributes the most.

3. Strategy Delivery and Review

3.1 The implementation of the strategy is led by the Scottish Government. Marine Scotland will continue to co-ordinate the existing network of sectors and stakeholders at the local and national level, by chairing a national stakeholder group to share and prioritise good practice on developing the strategy and monitoring outputs.

3.2 Responsibility for implementing the actions contained within the strategy is shared between a community of interests including Marine Scotland, Local Authorities, the wider public sector, business, environmental and community groups, and private individuals. It is anticipated that the strategy will benefit all users of the marine environment and coastal communities.

3.3 The focus will be on delivering actions which will be achievable in the lifetime of the strategy and within the staff and financial resources that are available from individual sectors.

3.4 The strategy will be delivered via the principles of:

- Central co-ordination from Marine Scotland, in the context of wider initiatives and international engagement;
- Implementation of actions by named responsible lead organisations, as set out in the action plan (Annex A);
- An action plan underpinning the strategy, with clear and measurable aims, deliverables, objectives and timescales;
- Initiatives that are measurable and have a direct impact on reducing litter from source;
- Utilisation and promotion of work carried out by existing networks and stakeholders;
- A mid-term review of the strategy and action plan, to allow for flexibility and appropriate updates.

3.5 As the strategy will contribute to working toward GES it is proposed that the timeframe should be closely aligned with that of the UK Marine Strategy. An assessment of environmental status will be made in 2024.

3.6 The action plan underpinning the strategy will require regular review, in partnership with stakeholders. A mid-cycle review is proposed for 2024-2025, and a further review in 2027. We will monitor the success of the strategy through an evaluation of actions: to what extent these have been completed, and to what timescales.

4. Strategic Directions and Actions

4.1 This section outlines the five objectives for the strategy, which incorporates activity and actions that already exist or are underway within the marine and, where appropriate, the terrestrial context.

4.2 New actions under each strategic direction will complement current activity.

4.3 A new action plan, with full details of the actions outlined in this section including timescales and organisations responsible for the work, is attached at Annex A.

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

4.4 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.

4.5 There are currently a range of initiatives aimed at: reducing marine litter, raising awareness of the problem, or changing behaviour.

Action to date has included:

The Scottish Government, with Zero Waste Scotland, has:

- Developed a communications toolkit for delivery partners and a behaviour change marketing campaign to discourage littering.
- Started work to better understand links between enforcement delivery and the legal system, in regard to littering and flytipping.
- Supported the Transport Litter Group's Litter Week of Action to cut litter on the transport network.
- Committed to working with the fishing sector and coastal communities to develop proposals to tackle the issue of fishing litter and lost gear.

- Hosted the British-Irish Council Marine Litter Symposium in 2019, where a joint commitment was made to improve collection and recycling of end of life fishing gear.
- Hosted an international marine conference in 2019, where the Trial Period campaign was launched to encourage the use of reusable sanitary products.
- Committed to introducing a deposit-return scheme for glass, metal, and plastic drinks containers.
- Taken forward legislation to:
 - Increase the fixed penalties for litter and flytipping, from £50 each, to £80 and £200 respectively.
 - Create powers for Loch Lomond and The Trossachs National Park to issue fixed penalties for littering and flytipping.
 - Create a requirement for alleged littering offenders to provide their name and address to enforcement officers.
 - Update the Code of Practice for Litter and Refuse, which improved clarity around duties to prevent and clean up litter stated in section 89 of the Environmental Protection Act (1990).
 - Discourage large-scale flytipping, with new powers for the Scottish Environment Protection Agency (SEPA) and action by Revenue Scotland and SEPA to recover landfill tax from illegally deposited wastes.
 - Introduce a charging scheme for single-use carrier bags, a highly visible form of litter, from October 2014.
 - Implement a ban on the manufacture and sale of rinse-off personal care products containing plastic microbeads, such as shower gels and toothpastes, from June 2018. Microbeads are a persistent and harmful form of marine litter.
 - Implement a ban on the sale of plastic-stemmed cotton bud sticks, a highly prevalent form of marine litter, from October 2019.

Actions from other organisations include:

- Keep Scotland Beautiful initiated its Upstream Battle project in 2018. The project works with local communities to inform and educate, in order to change littering behaviours. A network of volunteers have adopted sections of rivers and waterways, and collect and record litter to prevent it reaching the sea.
- The KIMO Fishing For Litter project has been running in Scotland since 2005. The project involves fishing boats returning marine litter hauled up in their nets to port for safe disposal. The long-term objective of the project is to influence the attitudes and behaviours of fishers, and to increase awareness amongst the fishing industry of the negative impact of marine litter.
- KIMO and Fidra have produced a community toolkit and best practice guidance for owners, maintenance organisations and users of artificial sports pitches, to reduce this source of microplastic pollution. Scottish Government is working with stakeholders to support the implementation of this Pitch In guidance in Scotland.
- Scottish Water introduced the Keep the Cycle Running public information campaign, to provide advice on the correct disposal of sanitary items, oils, and fats, in order to prevent sewer blockages.

Planned new actions up to 2027:

Objective	Action (Specific, Measurable, Achievable, Realistic and Timely)	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; and 2) Make necessary changes subject to the outcome of the evidence review.	1) Short term; 2) Medium to long term	Scottish Government - Zero Waste Policy Team
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 term (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 term (delivery end of 2024)	Scottish Government - 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 to medium term (2022-2025)	Scottish Water

Question 1:

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 1?

Objective	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Encourage positive behaviour and deter littering and flytipping.						
Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear.						
Improve waste management for collected marine litter.						
Reduce sewage related debris through a behavioural change campaign.						

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?

Yes	No	Don't Know

If “Yes”, please briefly specify any perceived gap(s) in planned actions under Strategic Direction 1 (and any supporting evidence for this)?

Comments:

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

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

Action to date has included:

4.7 Significant progress has been made, in particular via work with the plastics industry.

The Scottish Government has:

- Supported Water UK in their work to develop and promote a 'Fine to Flush' standard across British waste water companies, and encourage wet wipe manufacturers to adopt these standards. The Fine to Flush certification prohibits the use of plastics in these products.
- Supported the plastic industry's Operation Clean Sweep®, a voluntary initiative to implement handling best practice to prevent pellet loss.
- Formed the Scottish Plastic Pellet Loss Steering Group (PPLSG). The membership spans the industry supply chain from producer through to transporters and retailers, plus NGOs, regulatory bodies and other relevant organisations.
- Building on Operation Clean Sweep®, the PPLSG commissioned a report and action plan to prevent the loss of plastic pellets, powders and flakes across the supply chain.
- Following the supply chain report, Scottish Government sponsored the first industry pellet handling standard, the Publicly Available Specification 510 (PAS).
- The PPLSG developed minimum requirements for a certification scheme to enable businesses implementing good practice, as per the PAS, when handling or managing pellets to demonstrate this publicly with external auditing and a transparent, public registry.
- Consulted on legislation to restrict the sale or commercial supply of a number of single use plastic items including plastic cutlery, straws, and food and beverage containers made of expanded polystyrene. These Regulations were laid before the Scottish Parliament in November 2021.

Actions from other organisations include:

- Ship waste management plans and inspections of Garbage Record Books under the Merchant Shipping (Prevention of Pollution by Garbage and Sewage) Regulations 2008.

Planned new actions up to 2027:

Objective	Action (Specific, Measurable, Achievable, Realistic and Timely)	Deliverable	Timescale	Responsible 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 to long term	Scottish Government
	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 to long term	Scottish Government - Marine Scotland, with the plastics industry
	Review uptake of the PAS, and membership of an international plastic pellet certification scheme, once developed.	Review of effectiveness of supply chain approach.	Long term	Scottish Government - Marine Scotland, with the plastics industry
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 to long term	Scottish Government - Marine Scotland Clean Seas Policy Team, Marine Scotland Inshore Fisheries Team; Marine Litter Strategy Steering Group (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 term (delivery end of 2024)	Scottish Government - 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 to long term	Scottish Government - 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	Scottish Government - 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 to 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
	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.	Complete five aesthetic studies.	Long term (2021-2027)	Scottish Water

Question 3:

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 2?

Objective

Reduce plastic pellet loss into the marine environment

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

Reduce sources of sewage-related debris (SRD).

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Reduce plastic pellet loss into the marine environment						
Improve the ability of the fishing industry to retrieve lost fishing gear from the sea.						
Reduce sources of sewage-related debris (SRD).						

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?

Yes	No	Don't Know

If “Yes”, please briefly specify any perceived gap(s) in planned actions under Strategic Direction 2 (and any supporting evidence for this)?

Comments:

Strategic Direction 3:

Support the removal of marine litter from the marine and coastal environment

4.8 Significant action is already underway from a wide variety of organisations. These range from small community groups to national NGOs. Some of these initiatives have been in existence for many years or decades, and play a significant part in Scotland’s work to tackle marine litter. Notable current actions are listed below. As this is an area of importance covered by a vast number of groups and individuals, this section gives an idea of the range of initiatives underway.

Action to date has included:

The Scottish Government has:

- Committed £500,000 to begin to address the problem of litter sinks around the coast and to develop policy to address marine plastics, which has involved working with community groups. Arrochar (Loch Long) was identified as a case study area and is being monitored and maintained. 754 tonnes of litter has been removed from this litter sink between 2018-2021.

- Funded KIMO's Fishing For Litter project, which supports fishermen to remove and bring ashore litter that they catch in their nets.
- Funded Local Coastal Partnerships around Scotland, who all have a role to play in supporting beach cleans and other efforts to reduce marine litter.
- Funded SCRAPbook, a collaborative project between the Moray Firth Partnership, Sky Watch and Marine Conservation Society, to map the litter hot spots around Scotland's mainland coastline and support their clean-ups.

Actions taken by other organisations:

- Keep Scotland Beautiful's Clean Up Scotland campaign has supported thousands of volunteers each year to clean up in their local area and on beaches, preventing litter from ending up in waterways and potentially in the sea. The flagship Spring Clean event is held annually across the country.
- The Marine Conservation Society has run its UK-wide beach cleaning project Beachwatch since 1993. The annual flagship event, the Great British Beach Clean, involves thousands of volunteers removing tonnes of litter from the coastline each year.

Planned new actions up to 2027:

Objective	Action (Specific, Measurable, Achievable, Realistic and Timely)	Deliverable	Timescale	Responsible 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 to 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 River 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 to long term	Scottish Government - Marine Scotland; Zero Waste Scotland; Glasgow City Council; SEPA

Question 5:

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 3?

Objective	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Reduce the cost of disposal of collected marine litter						
Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal						
Expansion of the Fishing for Litter project						
Support the installation of riverine litter removal technology in the River Clyde						

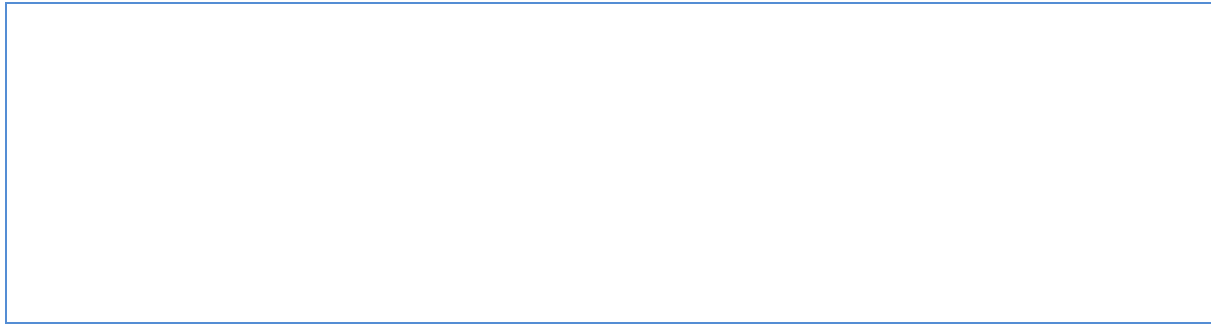
Question 6:

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?

Yes	No	Don't Know

If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 3 (and any supporting evidence for this)?

Comments:



Strategic Direction 4:

Improve monitoring at a Scottish scale and develop measures for strategy evaluation

4.9 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.

4.10 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 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.

Action to date has included:

Multiple actions which contribute to OSPAR monitoring programmes:

- Voluntary action through beach litter surveys using best practice techniques and OSPAR guidelines.
- Monitoring of seabed litter and floating microplastic litter is conducted by surveys carried out by Marine Scotland vessels.
- Monitoring of microplastic litter is conducted through sampling dead fulmars for microplastics in stomach contents.
- Research into a monitoring programme for microscopic plastic particles.

Additional actions:

- Fidra's Great Nurdle Hunt is a citizen science project recording the presence of plastic pellets on UK beaches.

Planned new actions up to 2027:

Objective	Action (Specific, Measurable, Achievable, Realistic and Timely)	Deliverable	Timescale	Responsible 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 to 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	Scottish Government - 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 development of an OSPAR agreed methodology for sediment microplastic monitoring.	Joint Research Council microplastics in sediment assessment methodology; and an OSPAR agreed methodology for sediment microplastic monitoring.	Long term	Scottish Government - Marine Scotland; Heriot Watt University; MASTS
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 Scotland 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, and 2) Long term	MLSSG; Scottish Government - Marine Scotland

Question 7:

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 4?

Objective	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Use of Fishing for Litter initiative data to evaluate industry engagement						
Accurate assessments of marine plastics in Scottish waters						
Development of an agreed methodology for inter-tidal microplastic monitoring						
Social science evaluation of the Marine Litter Strategy						
Understanding Scottish island beach litter						

Question 8:

Do you consider there to be any omissions or gaps in the planned actions identified in the Consultation Document that could help to contribute to the achievement of Strategic Direction 4?

Yes	No	Don't Know

If “Yes”, please briefly specify any perceived gap(s) in planned actions under Strategic Direction 4 (and any supporting evidence for this)?

Comments:

Strategic Direction 5:

Maintain and strengthen stakeholder co-ordination in Scotland, the UK, regionally, and globally

4.11 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.

Action to date has included:

- A Marine Litter Strategy Steering Group was formed by Marine Scotland, comprised of Scottish Government agencies, NGOs, industry, regulatory bodies and others. This stakeholder group meets regularly to share good practice, monitor outputs, and continue to develop the strategy.
- Scottish Government contributed to the development of the UK Marine Strategy.
- Scottish Government is a member of OSPAR's Intersessional working group for marine litter, and has supported delivery of the Regional Action Plan for Marine Litter work streams, including Action 52 on plastic pellet loss.
- Scottish Government has contributed to OSPAR work to produce an updated Regional Action Plan for Marine Litter.

Planned new actions up to 2027:

Objective	Action (Specific, Measurable, Achievable, Realistic and Timely)	Deliverables	Timescale	Responsible 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 to 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 to long term	Scottish Government - 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 for Marine Litter (to be identified 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 to long term	Scottish Government - 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 to long term	Scottish Government - 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 shared marine litter problems.	New joint commitments from British-Irish Council members on marine litter.	Long term	Scottish Government - Marine Scotland
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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?

Objective	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Expand communications and understanding of Marine Litter Strategy work with delivery partners						
Build on and strengthen working relationships with wider UK						
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.						
Strengthen co-ordination across the British-Irish Council region						

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?

Yes	No	Don't Know

If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 5 (and any supporting evidence for this)?

Comments:

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?

Comments:

Business and Regulatory Impact Assessment

To help us determine the impact of the policies / actions proposed in the consultation, 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)?

Yes	No	Don't Know

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.

Comments:

Annex A

The full action plan for this strategy can also be found within the Supporting Documents section. This can be found on the webpage for this consultation, on the Scottish Government website.

Responding to this Consultation

We are inviting responses to this consultation by 22 March 2022.

Please respond to this consultation using the Scottish Government's consultation hub, Citizen Space (<http://consult.gov.scot>). Access and respond to this consultation online at <https://consult.gov.scot/marine-scotland/updated-marine-litter-strategy-for-scotland/> You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of 22 March 2022.

If you are unable to respond using our consultation hub, please complete and return the Respondent Information Form to:

Marine Conservation Unit, Marine Scotland
Scottish Government
1B North
Victoria Quay
Edinburgh, EH6 6QQ

Handling your response

If you respond using the consultation hub, you will be directed to the About You page before submitting your response. Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document.

To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made available to the public at <http://consult.gov.scot>. If you use the consultation hub to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us. Responses will be published where we have been given permission to do so. An analysis report will also be made available.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to the contact address above or at marinelitterstrategy@gov.scot

Scottish Government consultation process

Consultation is an essential part of the policymaking process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations online: <http://consult.gov.scot>. Each consultation details the issues under consideration, as well as a way for you to give us your views, either online, by email or by post.

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.



An Updated Marine Litter Strategy for Scotland: Consultation

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:

<https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

No



Scottish Government
Riaghaltas na h-Alba
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The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-80201-813-4 (web only)

Published by The Scottish Government, December 2021

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS992066 (12/21)

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