

## DEFRA Marine Strategy UK

### Overview

#### General Comments

In terms of the Good Environmental Status (GES) descriptors, our previous response to Marine Strategy Framework Directive Part 1 in 2012 concentrated on Marine Litter descriptor 10, and this will remain the main focus of our response to this consultation.

#### **Source Control of Pollution**

With regard to achieving GES in the marine environment Scottish Water would wish to note the significant historic and ongoing contributions we make through our regulatory investment programmes. Significant investment in treatment of coastal and marine discharges has led to major improvements in the quality of our environment and in reducing marine litter. However, this comes with increased energy, resource and carbon demands.

Wastewater networks are open systems providing a vital function to ensure safe sanitation and prevention of (sewer) flooding. A key challenge in supporting a sustainable Scotland as we look to further improve our environment is to ensure we address pollution at source and explore as a society ways to reduce the pollutant loading into the sewerage system.

The water sector has invested significantly in engaging the plastics industry, Non-Governmental Organisations (NGOs) and the public through campaigns to seek to address this problem. Further initiatives such as control of single use plastics are a key means to support marine litter objectives in the MSFD.

We would welcome more of a focus on these aspects within the Marine Strategy.

### Detailed Response

#### Specific Comments

5	<b>Does the UK Marine Strategy Part One provide an accurate reflection of the state of UK marine waters and the economic and social uses of those waters?</b>
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Scottish Water has no specific comment to make on whether the information is an accurate reflection of the state of UK marine waters, however we welcome that a number of descriptors are achieving GES.

We further note that Descriptor 10 – Litter has not achieved GES, and as noted below would emphasise the continuing need to support source control. The

increased focus on Single Use Plastics needs to drive a source control agenda to prevent release to the environment.

**6 To what extent are the proposed new criteria and associated targets sufficient to guide progress towards achievement of GES?**

In general we welcome the steps and measures set out, but in keeping with our views above, would suggest that for D10 (Marine Litter), further source control references could be made. This should reflect the proposed EU Single use Plastics Directive, along with domestic legislation to limit releases to the environment.

**7 To what extent are the proposed operational targets sufficient to achieve GES?**

Scottish Water has no comment to make

**8 Where gaps have been identified do you have suggestions on how these could be filled?**

As a sector, the water industry is working through its collaborative research company, UK Water Industry Research Ltd (UKWIR), and with regulators to better understand the sources, impacts from and behaviours of microplastics in our water and waste water systems. This includes consideration of appropriate analytical methods to assess the type, size and quantity of microplastics. We will review the outcome of this with government and regulators in helping to identify further actions or research we may need to undertake.

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