

## Marine Litter Strategy Consultation

### Overview

#### General Comments

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

### Detailed Response

#### Specific Comments

Scottish Water, in agreement with the Scottish Government and SEPA, has developed a Route Map for Improving Urban Waters, which will sit alongside our River Basin Management Plan (RBMP) 3<sup>rd</sup> Cycle commitments. The Route Map was published in December 2021 and as such we are committed to reviewing and updating our deliverables currently set out in the Marine Litter Strategy (MLS) consultation document.

We are working to improve screening, monitoring of Combined Sewer Overflow (CSO) spill events and developing solutions to reduce release of sewage related debris (SRD) from the sewerage network.

We strongly believe that the best way to control SRD is through source control. We have developed a new customer awareness campaign, Nature Calls, that urges Scotland's people to only flush the 3Ps (pee, poo & toilet paper), bin the wipes and support a ban on all wet wipes that contain plastic.

We consider that campaigns alone cannot be successful in tackling marine litter in the long term. We are committed to working with stakeholders to remove unnecessary plastic from the products which are likely to become SRD, such as wet wipes containing plastic, plastic tampon applicators and plastic tobacco filters.

We are working with national and international stakeholders to influence policy and to improve labelling of products e.g., Water UK and Eureau.

We would welcome an action on Zero Waste Scotland (ZWS) preparing businesses for future changes in legislation such as The Environmental Protection (Single-use Plastic Products) (Scotland) Regulations 2021, so they can make the appropriate informed changes to reduce problematic and commonly littered plastics.

The consultation states that the first review will be held in 2024-25 and the second in 2027, we would ask whether it has been considered that 3 review periods are considered to match the short, medium and long-term timescale of the deliverables?

1	<p><b>SD 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?</b></p> <p><b>Please indicate against the objectives below either - Strongly Agree, Agree, Neutral, Disagree, Strongly Disagree, OR Don't Know.</b></p>
<p><b>Objectives</b></p> <p><i>Q. Encourage positive behaviour and deter littering and flytipping?</i> A. Strongly agree, positive behavioural changes need to be made, including active enforcement of litter penalties.</p> <p><i>Q. Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear?</i> A. Neutral, we do agree with the principle but lack knowledge of this industry to express a formed opinion.</p> <p><i>Q. Improve waste management for collected marine litter?</i> A. Strongly agree, essential action.</p> <p><i>Q. Reduce sewage related debris through a behavioural change campaign?</i> A. Strongly agree, we believe that behaviour change campaigns are very important in reducing litter and must be carried out in conjunction with source control activities such as removing unnecessary plastics from the supply chain and clear labelling of products.</p>	
2	<p><b>SD 1. 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?</b></p> <p><b>Yes, No, Don't Know.</b></p> <p><b>If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 1 (and any supporting evidence for this)?</b></p>
<p>Scottish Water recently launched our new 'Nature Calls' campaign and we will work with Marine Scotland to update Strategic Direction 1.</p>	
3	<p><b>SD2. 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?</b></p> <p><b>Please indicate against the objectives below either - Strongly Agree, Agree, Neutral, Disagree, Strongly Disagree, OR Don't Know.</b></p>
<p><i>Q. Reduce plastic pellet loss into the marine environment?</i> A. Agree</p>	

Q. *Improve the ability of the fishing industry to retrieve lost fishing gear from the sea?*  
A. Neutral, we do agree with the principle but lack knowledge of this industry to express formed opinion.

Q. *Reduce sources of sewage related debris (SRD)?*  
A. Agree, we would direct you to our answer to question 4.

4	<p><b>SD2. 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?</b></p> <p><b>Yes, No, Don't Know.</b></p> <p><b>If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 2 (and any supporting evidence for this)?</b></p>
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Yes, Scottish Water recently published a Route Map for Improving Urban Waters, which will sit alongside the River Basin Management Plan (RBMP) 3<sup>rd</sup> Cycle, we will work with Marine Scotland to update Strategic Direction 2.

In addition, we wish to highlight that an estimated 120 tonnes of tobacco waste are discarded in the UK every day, costing millions to clear up. When littered, tobacco filters may be washed into drains, entering the surface water system and marine environment.

Tobacco filters contain plastic in the form of cellulose acetate which can take up to 12 years to break down. Research shows that they can be made of pure cellulose instead, which breaks down in a matter of weeks. We would therefore support a ban on tobacco filters containing plastic as well as action on reducing littering of these products.

We would also recommend consideration be given to the emerging issue of vaping litter.

5	<p><b>SD3. 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?</b></p> <p><b>Please indicate against the objectives below either - Strongly Agree, Agree, Neutral, Disagree, Strongly Disagree, OR Don't Know.</b></p>
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Q. *Reduce the cost of disposal of collected marine litter?*  
A. Agree

Q. *Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal?*  
A. Agree

Q. *Expansion of the Fishing for Litter project?*

A. Neutral, we do agree with the principle but lack knowledge of this industry to express formed opinion.

Q. *Support the installation of riverine litter removal technology in the River Clyde?*

A. Agree, we would recommend that attention is given to identifying the source of the litter collected in order to tailor appropriate actions across Stakeholders.

**6 SD3. 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)?**

Don't know

**7 SD4. 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?**

**Please indicate against the objectives below either - Strongly Agree, Agree, Neutral, Disagree, Strongly Disagree, OR Don't Know.**

**Objectives**

Q. *Use of Fishing for Litter initiative data to evaluate industry engagement?*  
A. Neutral, we do agree with the principle but lack knowledge of this industry to express formed opinion.

Q. *Accurate assessments of marine plastics in Scottish waters?*  
A. Agree

Q. *Development of an agreed methodology for inter-tidal microplastic monitoring?*  
A. Agree

Q. *Social science evaluation of the Marine Litter Strategy, Understanding Scottish Island beach litter?*  
A. Agree

**8 SD4. 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)?**

No	
9	<p><b>SD5. 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?</b></p> <p><b>Please indicate against the objectives below either - Strongly Agree, Agree, Neutral, Disagree, Strongly Disagree, OR Don't Know.</b></p>
<p><b>Objectives</b></p> <p><i>Q. Expand communications and understanding of Marine Litter Strategy work with delivery partners?</i> A. Agree</p> <p><i>Q. Build on and strengthen working relationships with wider UK?</i> A. Agree</p> <p><i>Q. 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?</i> A. Agree</p> <p><i>Q. Strengthen co-ordination across the British-Irish Council region?</i> A. Agree</p>	
10	<p><b>SD5. 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?</b></p> <p><b>Yes, No, Don't Know.</b></p> <p><b>If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 5 (and any supporting evidence for this)?</b></p>
<p>Yes, we consider there is scope to include engagement with other bodies e.g., WRAP (The <i>UK Plastics Pact</i> brings together businesses from across the entire plastics value chain with <i>UK</i> governments and NGOs to tackle the scourge of plastic).</p>	
11	<p><b>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?</b></p>
No	

12	<p><b><i>Business and Regulatory Impact Assessment</i></b></p> <p><b>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)?</b></p> <p><b>Yes, No, Don't Know.</b></p> <p><b>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.</b></p>
<p>Scottish Water is supportive of the proposed measures under the Marine Litter Strategy. We do not consider that the final agreed actions for Scottish Water within the MLS will result in additional implications over and above business as usual.</p>	

**Scottish Water Consultation Response  
March 2022**



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