



## **Marine litter strategy for Scotland** Consultation response, March 2022

### **Introduction to Scottish Environment LINK**

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Aquaculture Subgroup.

### **Response**

Scottish Environment LINK members welcome the opportunity to respond to the Scottish Government's Marine litter strategy. We broadly agree with the proposals made in the Strategy, but would like to emphasise the following points.

#### **Fishing and aquaculture Litter**

- Fishing and aquaculture industries need to become more circular, with gear and other equipment being re-used and recycled.
- There is a need for an extended producer responsibility (EPR) scheme for fishing and aquaculture equipment, whereby producers pay for the collection and re-use or recycling of litter. The scheme must also be designed to incentivise the design of equipment to be reusable and recyclable and minimise its life-cycle costs through an appropriate modulated fee structure.
- The collection of 'litter' needs to be encouraged through enabling free returns of gear and waste collected at sea.
- There should be a consistent approach across LAs with all coastal LAs offering re-use and recycling facilities for marine fishing and aquaculture gear litter, which would be paid for by the EPR fees. Re-use should be maximised by supporting repair enterprises linked to these facilities.
- An additional action is recommended to develop guidelines in siting, maintenance and handling of fishing and aquaculture gear. Such guidelines should be developed to encompass best practice that will minimize wear and tear, increase the life span of fishing and aquaculture equipment, and prevent litter from routine maintenance such as the net cuttings from net repairs

#### **Litter in coastal and island communities**

- These are often tourist and litter hotspots. Further efforts and support should be made available to encourage the use of reusable takeaway packaging by businesses and the public to prevent this pollution at source, as well as ensuring adequate infrastructure and services to deal with the litter.

#### **Sewage related debris**



- Scottish Government should ban the production and sale of single use plastic wet wipes and other plastic sanitary items where alternatives exist. Marine Conservation Society data from their Great British Beach Clean event in 2021 showed an average of 38.4 Sewage Related Debris (SRD) items (wet wipes, sanitary pads (period and incontinence), tampons, tampon applicators and nappies) were recorded per 100m of Scottish beach surveyed by volunteers compared to only an average of 19.9 and 11 SRD items per 100m on English and Welsh beaches respectively. On average SRD beach litter comprised only 6.3% of the total litter items recorded on surveyed beaches throughout the UK, compared to 11.1% in Scotland alone, underlining the need to take urgent action in Scotland to tackle SRD.
- There should be increased monitoring and screening of all combined sewer overflows and targets set to reduce spills. We welcome the targets in the draft Marine Litter Strategy, but they need to be much more ambitious.
- Scottish Government should support a move to reusable wipes, nappies and period products by providing information on hygiene and reducing initial costs.

### Plastic pellets

- To address pellet loss across the supply chain and support the implementation of the BSI PAS standard on plastic pellets, flakes and powders further legislation is required.
- The Strategy must include actions to ensure pellet loss is addressed through legislation including through other regulatory and legislative mechanisms such as UK REACH and Scottish Government's Circular Economy Bill.
- Scottish Government must support efforts to ensure certification schemes are being developed in line with the OSPAR guidelines. 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.

### Artificial pitches

- Tyres that have been recycled into Styrene Butadiene Rubber (SBR) crumb is the most commonly used performance infill on artificial turf pitches in Scotland and is having significant environmental impacts. SBR infill can migrate from pitches when uplifted during maintenance activities, displaced by rain or wind, or can be transported off the pitch by players. This can lead to microplastic ending up in local surface water or lost to wastewater via drains.
- Once in the environment this microplastic material can cause harm to wildlife who can easily ingest the material. Additionally, ecotoxicity of tyre rubber leachate and the leaching of heavy metals and organic compounds from SBR is well documented and studies have shown that scrap tyre materials may affect surface water and groundwater. Additionally, wear and tear of the infill material, following exposure to sunlight, air and water has been shown to produce airborne microplastic particles in dust.  
[www.fidra.org.uk/pitchin](http://www.fidra.org.uk/pitchin)
- The Scottish government should consider a ban on SBR infill in order to prevent significant damage from this source of microplastic pollution.
- There are viable and affordable alternative infills in Europe which offer the same standards of play as SBR, which can also be adopted in Scotland.
- Other countries and the EU are potentially banning SBR on artificial pitches. Scotland should be prepared to commit to a ban to prevent Scotland from being a dumping ground for end-of-life tyres.

### Chemical pollution

- Physical litter is a source of chemical pollution and the physical and chemical components must be examined and addressed holistically to avoid policy failures, such as regrettable substitution. For example, single use plastic food packaging is increasing being replaced by compostable materials. These are often treated with PFAS, poly- or per-fluorinated alkyl substances, a group of persistent chemicals



and known marine pollutant in Scottish waters and wildlife. Further recognition and coordination is required both in legislative actions and monitoring to ensure that the impacts are realized and addressed together.

### **Timescales and ambition**

- 'Improving waste management for collected marine litter' (Strategic Direction 1) needs to be done on a short/medium timescale, not in the long-term as proposed.
- Under Strategic Direction 2, 'Banning plastic wet-wipes' needs to be done on a short timescale, not the medium/long term timescale proposed.

### **Collaboration**

- To effectively tackle the global issue of marine litter there must be consistent and effective collaboration across the UK nations. There is a need for a working framework with other administrations to ensure the Internal Market Act strengthens rather than weakens legislation to reduce litter and move towards a circular economy. Collaboration is required to ensure the policies outlined in this strategy, including the proposed ban of plastic wet wipes, is effective and enforceable in Scotland and would encourage the rest of the UK to follow suit as soon as possible.

This response was compiled on behalf of LINK Marine and Economics Groups and is supported by:

Fidra  
Scottish Wild Land Group  
Friends of the Earth Scotland  
Whale and Dolphin Conservation  
Scottish Wildlife Trust  
Keep Scotland Beautiful  
Marine Conservation Society  
National Trust for Scotland  
Scottish Seabird Centre  
Association for the Protection of Rural Scotland  
Scottish Campaign for National Parks

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**Scottish Environment LINK** the voice for Scotland's environment



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LINK is a Scottish Charity (SC000296) and a Scottish Company Limited by guarantee (SC250899), core funded by Membership Subscriptions and by grants from NatureScot, Scottish Government and Charitable Trusts.

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