

**The Highland Council**

**Transport, Environmental and Community Services Committee  
19 September 2013**

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| Agenda Item | <b>11</b>        |
| Report No   | <b>TEC 71/13</b> |

**Scottish Government Consultations:**

- a. **Towards a Litter-Free Scotland: Consultation on a strategy to tackle and prevent litter and fly-tipping**
- b. **Draft Scottish Marine Litter Strategy Consultation**

**Report by Director of Transport, Environmental and Community Services**

**Summary**

This report invited Members to approve the Council's response to the Scottish Government's consultation on "Towards a Litter Free Scotland" and the Draft Scottish Marine Litter Strategy", as contained in **Appendices 1 and 2**.

**1. Towards a Litter-Free Scotland: Consultation on a strategy to tackle and prevent litter and fly-tipping.**

- 1.1 This National Litter Strategy consultation takes forward the Scottish Government's commitment to tackle litter and helping to create the cleaner, safer communities we all need.
- 1.2 The consultation outlines support for practitioners and stakeholders through to 2020, with a focus on influencing individuals to take more responsibility.

The consultation puts forward a package of measures designed to complement and reinforce each other. These will challenge individuals who litter and fly-tip, support those who already dispose of their waste responsibly and encourage more recycling.

**2. Actions**

- 2.1 The document includes 17 actions which are set out under three strategic directions:
  1. Information: communication, education and support for business
  2. Infrastructure: providing/servicing bins, product design, guidance and future funding
  3. Enforcement: improving the effectiveness of legislation and training

2.2 The proposed response is attached as **Appendix 1**.

### **3. Draft Scottish Marine Litter Strategy Consultation**

3.1 Marine Scotland is developing a high level draft Marine Litter Strategy which aims to address the levels of marine litter present in our marine and coastal environment.

3.2 The Strategy seeks to maximise opportunities and minimise threats to addressing the levels of litter present, and recognises that the Marine Strategy Framework Directive is a key driver for addressing the problem of marine litter in Scotland.

3.3 The Marine Litter Strategy provides an opportunity to build on current initiatives to reduce marine litter and consider what additional work or interventions may be of value at the national level to implement the Marine Strategy Framework Directive.

### **4. Actions**

4.1 The vision for this Strategy is to identify achievable actions focussed on tackling marine litter, in parallel with actions to be targeted by the National Litter Strategy; to continue to support and raise awareness of removal of marine litter; and contribute to the overall aim of achieving GES (Good Environmental Status) as required by the MSFD.

4.2 The vision embodies five strategic directions:

**Strategic Direction 1:** Improve public and business awareness of, and behaviour changes around, marine litter.

**Strategic Direction 2:** Reduction of land-sourced marine litter entering the marine environment, in parallel to the National Litter Strategy.

**Strategic Direction 3:** Contribute to a low carbon economy by treating 'waste as a resource' and seizing the economic and environmental opportunities associated with the Zero Waste Plan.

**Strategic Direction 4:** Improvement of monitoring at a Scottish scale.

**Strategic Direction 5:** Stakeholder engagement at the UK, EU and international scales.

The proposed response is attached as **Appendix 2**.

### **5. Implications**

5.1 There are no resource implications associated with this report.

5.2 There are no legal implications associated with this report.

5.3 There are no equality implications associated with this report.

5.4 There are no climate change implications associated with this report.

5.5 There are no risk implications associated with this report.

## **6. Recommendation**

6.1 Members are invited to approve the Council's response to the Scottish Government's consultation on "Towards a Litter Free Scotland" and the Draft Scottish Marine Litter Strategy", as contained in **Appendices 1 and 2**.

Designation: Director of Transport, Environmental and Community Services

Date: 6 September 2013

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## Appendix 1

### TOWARDS A LITTER-FREE SCOTLAND

Consultation on a strategy to tackle and prevent litter and flytipping



### CONSULTATION QUESTIONS

#### Strategic approach

**Q1. Do you agree that the strategic approach proposed (Action 1) should form the basis of the National Litter Strategy's overall vision, mission, values and objectives?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

The Council fully supports the need for a National Strategy and a long term campaign aimed at eradicating littering & fly-tipping. This will require support for Local Authorities in the delivery of increased information, infrastructure and enforcement activities relating to litter and fly-tipping.

However there are two vital issues with the proposal that needs to be corrected:

1. Litter has over the last decade or so supplanted "street cleansing" as the focal point. This has led to a diminution in the need to have clean streets (which also means litter free streets). The Strategy therefore needs to make the distinction and re-focus;
2. Littering and Fly-tipping are quite distinct and tackling them requires very different forms of campaign, infrastructure and enforcement strategy. Focusing on each as separate entities will ensure each is afforded the appropriate emphasis and development of tailor-made strategies.

#### Information strategic direction

**Q2. Do you agree that improved communications (Action 2), education resources (Action 3) and business engagement (Actions 4 and 5) should be the National Litter Strategy's information focus for preventing litter?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

National litter and fly-tipping brands are essential (see above for the distinction between the two). However they must be suitable for adaptation for use at a local level. The "Recycle for Scotland" brand is a good example of where materials can easily be rebranded for Local Authority use as in

“Recycle for Highland”. Materials should also be adaptable for cross sector use in the business, community and educational environments. It also is essential that Local Authority practitioners are consulted on the brand to ensure maximum buy in before it is accepted at a national level.

Support of Eco-schools and litter and fly-tipping education must be continued but resource must be available to ensure Eco-school awards actually reflect a culture shift in behaviour rather than a one-off burst of activity to attain the award status.

Tenable/robust metrics would have to be developed to measure progress.

**Q3. If you are responding on behalf of a group/organisation: as a business or organisation (including litter duty bodies) would you find it valuable to have a national recognition scheme which supports you in encouraging positive behaviour (Action 5)?**

Yes  No  Partially

Please provide reasons for your answer.

It is important that businesses play a role in reducing litter and fly-tipping. This can be achieved by both coercive means and otherwise. A recognition or awards scheme would again have to be sufficiently robust to last the test of time rather than simply at the evaluation and awards stage. Only a campaign for the long-term together with enforcement and buy-in by business and other on an on-going basis will see real change.

Any recognition strategy should be allied to all or many of the other Scottish Gov't goals, including sustainability, wellbeing, and so on which will allow a multitude of messages to be delivered and hopefully for discrete effort in street cleansing to be recognised as simply one part of a greater effort to make Scotland a better place in which to live (a good example is the blight of cigarettes on health and of cigarette litter – there are great opportunities to mix and match the messages).

### **Infrastructure strategic direction**

**Q4. Do you agree that businesses and other organisations have a key role to play in the design of products and packaging to reduce litter and that those with litter control responsibilities should be encouraged to recycle more (Actions 6 and 7)?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

Work with manufacturers on product design must continue. This has and will continue to reduce the quantity of total waste arising, and make packaging more recyclable (and hopefully from an ever increasing amount of recycled material) or move packaging to the re-use market. However it

may not by itself be effective in decreasing the quantity of litter. Local Authorities require increased support in rolling out Recycle on the Go bins. This will ensure a future where the opportunity to recycle a wide-range of materials is available to as many people as possible while they carry out their day to day business away from their domestic recycling facilities. Eventually there must be a shift towards matching the design of product packaging to the range of recyclable materials reprocessed and recycling facilities and on the go facilities and that can be readily provided where there is the potential for waste/litter generation.

Whilst the above is vital it is diversionary – the main message of the Litter and Fly-tipping campaigns (because there should be two) is that these practices are unacceptable- not that redesign can in some way reduce it.

There also needs to be a recognition that some products which cause great distress cannot be redesigned out. Two obvious products are cigarette ends and chewing gum; and it would be prudent to consider discrete elements to deal with these two matters.

**Q5. Are you able to provide details of good practice in reducing accidental litter arising from waste and recycling collections (Action 8)?**

Yes  No

Please provide any details and/or evidence of good practice.

Highland Council actively engages with businesses and households who present refuse bins with either gaping lids or side waste. This policy coupled with a strict approval system for “second bin’s” only policy has not only reduced littering, but has also driven up recycling rates via the co-mingled recycle collection.

**Q6. Do you agree the Code of Practice on Litter and Refuse (Scotland) 2006 should be revised (Action 9) to reflect the National Litter Strategy?**

Agree  Partially agree  Disagree

Please provide reasons for your answer and, if applicable, any details of how you believe the Code of Practice on Litter and Refuse should be improved.

This must happen. However before doing so the Scottish Government must engage with Cosla and the Waste Managers Network to discuss fully the extent of the proposed review. In particular there must be a recognition of the need to return to “street cleansing” and the objective of having clean streets rather than litter free streets and of how in ever more straitened times local government can best achieve this end. The Scottish Government should also take the opportunity to examine the law around street cleansing and the relevant sections on “bins”; and also on the responsibilities regarding trunk roads.

Q6a. Are there aspects of the Code of Practice on Litter and Refuse (either those mentioned at Action 9 or additional areas) that you believe should be improved. If so how?

Yes  No

Please provide any reasons for your answer and details of any suggested improvements.

A review should be undertaken in partnership with practitioners in local government to ensure that a practical robust and accountable document is the product which accurately reflects best practice and embodies the government's objectives.

**Q7. Do you agree that robust measures are needed to monitor National Litter Strategy progress and to measure success (Action 10) including requiring additional litter duty bodies to demonstrate how they are meeting their responsibilities (Action 9)?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

The obvious answer is yes. But this can only be done as part of the above mentioned process with local government at its heart. The very last thing local government requires is further "performance monitoring" derived from bodies who have little or no experience of the work or the context of street cleansing (and again to make the point – litter is only one type of material which comprises the material that street cleansing must remove) in local government.

**Q8. Do you agree that the National Litter Strategy should support communities in developing local initiatives to prevent litter (Action 11)?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

The Highland Council actively supports Community clean-ups and fully supports the notion that community groups should receive support from Zero Waste Scotland to increase the number of clean-up activities being performed throughout Scotland. However it is necessary to have in place systems that ensure the good work being performed by Community groups does not replicate work already carried out by Local Authorities. It is also important to recognise that where communities become involved will almost inevitably result in more work for Council officials and this must be carefully weighed in the balance when making generally positive views about what communities may be able to achieve.

**Q9. Do you agree that future Zero Waste Scotland funding should focus on activity which supports the strategy’s objectives, including requiring publication of approaches to litter delivery (Action 12)?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

Any funding should be available to projects that support the strategic direction. With regard to information a national brand that can be adapted to a local brand as outlined in Q2 is imperative. This should not only be used by Local Authorities but by any organisation receiving funding. An extension of funding for Recycle on the Go bins would prove hugely beneficial in Highland. It would enable communities beyond our major towns to start to access what must be seen as the future norm in how litter and recycle is dealt with while residents are away from home. Any support to raise awareness of the consequences of littering would be welcome. However – street cleansing should not be forgotten and if significant monies are to be applied then there is certainly a case to be made for the money to be spent on “more boots on the ground”.

**Q10. Do you agree that that the strategy should recognise the specific interventions that will be required for tackling flytipping (Action 13)?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

As stated above litter and fly-tipping are two very different activities. The latter usually driven by the attempt to save money and or time and in most cases requires a more robust enforcement intervention by Local Authority, SEPA or Police Scotland or a combination of all of them – and in this vein it may be prudent to examine the rolls of each; but separately from the strategy. It is important that the document remains a strategy and to this end it should be succinct and should not attempt to deal with detail (ie a plan).

### **Enforcement strategic direction**

**Q11. Do you agree National Parks Authorities should have the power to issue Fixed Penalties (Action 14)?**

Agree  Disagree

Please provide reasons for your answer.



Yes. It is logical and straight forward and will go some way to alleviate the weight of public expectation on the existing enforcement resource.

Q11a. Are there other public bodies you believe the power to issue Fixed Penalties should be extended to, and why (Action 14)?

Yes  No

Please provide reasons for your answer.

The Duty Bodies mentioned in Option 2 of the Business and Regulatory Impact assessment all have staff who could be authorised to issued Fixed Penalty Notices. These bodies include; local Authorities, Railway Bodies, Scottish canals, National Parks Authorities, Police Scotland and the British Transport Police.

However it should be recognised that there is an immense difference between authorising staff and actually having that staff resource active in the area of enforcement.

The key is to imbue all of the various staff who can be readily trained to issue FPNs (and many of them should also be given the job of clearing litter as they go) with the notion that this is vital work for the benefit both to their organisation but also to the wider constituency and therefore of real value to the communities they serve.

**Q12. Do you believe it would be valuable to have the option to offer a discount to encourage prompt payment of Fixed Penalties for littering (Action 14)?**

Yes  No

Please provide reasons for your answer. We would also welcome views on what level of discounts should be permitted.

The notion (whether FPNs are in fact a deterrent remains to be seen) that Fixed Penalty Notices act as a deterrent would be diminished if a discount for prompt payment was introduced. A better proposal may be to replicate the Dog Fouling FPN and to increase the penalty for non-payment within a 14 day period. It may also be pertinent to include a mechanism to recover costs for the administration of any reminder procedure or court costs.

The Council would also like to explore the opportunity and barriers to a process whereby the litterer must spend time clearing litter. However only in a situation where the bureaucracy around such a scenario was minimal.

**Q13. Do you agree that the level of Fixed Penalties should be increased to £80 for litter and £200 for flytipping (Action 15)?**

Agree  Partially agree  Disagree

Please provide reasons for your answer. If you do not agree, what level should the Fixed Penalties for litter and flytipping be set at, and why?

A fixed penalty of £80 for litter is probably about the correct level for littering – but the level is not the key – enforcement is. However “fly-tipping” is in some cases a trivial description for contraventions of The Environmental Protection Act 1990 S. 33.

This Council has recently been involved in attempts to locate and prosecute fly-tippers who are engaged in the construction of new drives. Each piece of work earns the “contractor” significant income. A FPN of £200 is little more than a business expense. Taking such matters to court (as a contravention of S33 may not in fact elicit a greater penalty for all of the effort and uncertainty involved – see below).

The FPN should therefore be applied at a rate equivalent to a loss in the overall transaction. Therefore if fly-tipping saves an individual £1,000 in disposal costs then the penalty should be commensurate with clean-up costs + punishment.

However the much lauded multi-agency approach to dealing with fly-tipping needs to be examined in some detail and all of those with real “stop powers” must be “encouraged” to engage and use those powers quickly – in particular: vehicle inspection and seizure (Vosa/Police/SEPA), Trading Practices (Trading Standards/Revenue and Customs).

Procurators Fiscal must also be challenged to take more cases to court and for penalties at court to reflect public expectation – again the penalty must be greater than the gain.

For householders fly-tipping an old bed for example a FPN of £200 would be appropriate given this could be disposed of free of charge.

The Strategy should incorporate a specific view on how enforcement should deal with school age children. A distinct approach to 12-16 yr old litterers and enforcement should also be developed apart from the Strategy (see later).

**Q14. Do you agree that the effectiveness of enforcement can be improved by reviewing training and guidance (Action 16)?**

Agree  Partially agree  Disagree

Please provide reasons for your answer.

Any training that improves the effectiveness of enforcement officers within the Duty Bodies and staff within the Crown Service and Procurator Fiscal Service must be welcomed. However the cost of training staff to a level

where they are sufficiently competent to follow the whole process through from the issue of the FPN to any potential court appearance is an expensive exercise. Funding to facilitate this training would assure a more effective use of the FPN process.

Q14a. What other training and guidance issues, if any, do you believe the review should address? Please provide details.

A standardised approach to the process of, and the paperwork used in, issuing fixed penalties would prove useful. It is also important that work is done to develop a national strategy for dealing with those in the under 16 age group who litter. Training of officers would be required to ensure their knowledge of the processes and paperwork in use remains current.

**Q15. Do you agree there is a case for future improvements in the enforcement system to make it more effective in preventing littering and flytipping (Action 17)?**

Agree  Partially agree  Disagree

Please provide reasons and/or evidence for your answer.

The question is based on the premise that enforcement against individuals will eventually translate into a culture change across the entire population through time. The case for this has not been made.

Enforcement is one strand of the overall package of measures which have to be brought together over the long term to effect real and lasting change.

It is therefore important to ensure that any changes to the enforcement process is not seen as the solution to "littering"; but rather to make the system more efficient or somewhat more effective.

All of the suggestions in the actions have considerable merit. The Highland Council would be happy to be involved in any discussions aimed at improving the enforcement regime.

Many of the points relevant to this question have already been addressed in previous answers.

Q15a. What priority do you attach to improving prevention through enforcement in the examples summarised below and referenced in Action 17?

1. High
2. Medium
3. Low
4. None

| Potential improvements  | Priority | Reason  |
|---|----------|---|
| Include litter under the anti-social behaviour Fixed Penalties regime   | High     | A standardisation of Fixed Penalty Notice books for Police Scotland would make it easier for Officers to deliver Fixed penalty Notices for littering under ASB legislation. |
| Overcome barriers to enforcement in cases of littering from vehicles  | High     | This is a significant issue on main/trunk roads and removal presents real H&S issues for staff and disruption to road-users.  |
| Improvements to the waste carrier licensing system and duty of care compliance for businesses   | High     | A system where vehicles registered to carry waste must have an easily identifiable disc or plate on display.  |
| Extend the list of categories to which a Street Litter Control Notices applies  | High     | Why make any unnecessary restrictions on the application of these notices? They should have the widest possible application that the law will allow.                        |
| Explore whether there might be an effective mechanism for litter practitioners to intervene when printed materials create litter problems | High     | This seems to be a very obvious and fair intervention.  |

Q15b. What additional areas, if any, could make the enforcement system more effective in preventing litter and flytipping?

Please provide details, reasons for these and what level of priority you would attach to these.

The introduction of the option to carry out community service (but not through the existing system) could be a viable option to a fixed penalty notice especially in the case of those who fall into the under-16 category. Through organised community clean ups the communities blighted by litter would see tangible pay back from those responsible for the environmental degradation of the affected areas.

However the importance of the eradication of litter and flytipping seems to have diminished over time. Steps must be taken to ensure that the momentum generated by this strategy is not lost.

### **General comments**

**Q16. Do you have any further comments on or ideas for the National Litter Strategy?**

Yes  No

Please provide any details with reasons and evidence for these.

To reiterate the points made above it is vital that the Government engages fully with Cosla, the Waste Managers Network and Local Authorities to ensure that all plans derived from this strategy are practicable, realisable, measurable can be delivered.

**Strategic Environmental Assessment**

**Q17. Do you have feedback on the findings of the assessment?**

Yes  No

Please provide details of any feedback.

**Partial Business and Regulatory Impact Assessment (BRIA)**

**Q18. Are there particular issues you want to highlight with regard to the partial BRIA and the potential impacts on the third sector, business and the economy?**

Yes  No  Partially

Please provide details.

**Equalities**

**Q19. Are there any equalities issues that you wish to highlight so that these can be factored into the Equalities Impact Assessment for the National Litter Strategy?**

Yes  No  Partially

Please provide reasons for your answer. We welcome views on potential impacts, either positive or negative, which you feel the actions in this consultation document may have on any particular groups of people.

## Appendix 2 - Draft Scottish Marine Litter Strategy Consultation

### CONSULTATION QUESTIONS

#### Structure

**Q1. Do you agree with the timescales outlined?**

Yes  No

No Comment

#### Vision

**Q2. Do you agree with this vision?**

Yes  No

**Q3. Does the draft vision have the right level of ambition? If not, please offer alternative text or suggestions.**

No Comment

#### Marine Strategy Framework Directive

**Q4. Do you think implementation to achieve Good Environmental Status under Descriptor 10 will be sufficient or do you think additional action in Scotland is also necessary?**

Yes  No

The development of good baseline data and then the introduction of a % reduction target would prove a better measurement of any improvement in the environmental status of our marine environment. It is recognised that this is not viable everywhere but could be introduced in a number of marine litter hotspots.

#### Strategic Directions

**Q5. Do you agree that Strategic Directions are a suitable way of outlining action under the Strategy?**

Yes  No

**Q6. Do you agree with the list of Strategic Directions?**

Yes  No

**If not, how would you reword them or what would you add?**

Strategic Direction 3 should include marine-sourced litter.

### **Actions**

Strategic Direction 1:

**Q7. What are your views on the possible actions?**

**Q8. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q9. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

Q7 More detail on how the education element of the possible actions will be delivered is required. How will this be delivered and more importantly, how will it be funded? Any campaigns should be national campaigns that can be tailored to suit local needs.

It is also important that tools are developed to accurately assess marine litter as per MSFD Task Group 10.

The action to encourage manufacturers to change the design of products so they may be less harmful when they enter the marine environment is to be applauded. However, care must be taken to ensure that a behaviour shift to not littering is the main thrust of any activity.

Q8. An attitudinal survey aimed at why people litter would be a great help in guiding any education actions.

Funding initiatives such as KIMO and beach cleans would also prove beneficial.

Q9. There seems to be great deal of reliance on the litter strategy which only addresses litter originating from land, more needs to be done to address litter originating from the marine environment.

Existing agencies such as Zero Waste Scotland, Scottish Water and the Marine Conservation should be involved in developing and delivering educational information with input from Local Authorities.

The Highland Council is currently an active member of KIMO and our Ranger service delivers a number of seashore activities that educate our residents and visitors regarding marine litter issues.

The Council has also developed a policy on balloon release which can have a significant

impact on the marine environment.  
<http://www.highland.gov.uk/yourenvironment/sustainabledevelopment/greencouncil/balloons.htm>

It should also be noted that litter/debris from the aquaculture industry can also be a hazard.

Strategic Direction 2:

**Q10. What are your views on the possible actions?**

**Q11. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q12. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q13. Do you think any of the existing actions need to be improved? If so, please provide details.**

Q10. Highland Council are making a significant contribution to the Pentland Firth and Orkney Waters spatial plan process but more direct actions are required therefore expanding the Fishing for Litter would be more effective.

Q 11. Both this question and Q8 suggest that only the most popular or easily understood action may be acted upon, this strategy will not always produce the best outcome.

Q.12. More action is needed see answer to Q 11.

Q 13. No Comment

Strategic Direction 3:

**Q14. What are your views on the possible actions?**

**Q15. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q16. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q17. Do you think any of the existing actions need to be improved? If so, please provide details.**

Q.14 These actions should be more clearly linked to marine litter sourced



from land or sea. They should also be more definite as “look” and “seek” don’t actually promise to deliver anything.

However it should be noted that any actions that can be delivered that increase recycling of materials are welcome.

Q 15. See answer to Q11.

Q 16. No Comment

Q 17. No Comment

#### Strategic Direction 4:

**Q18. What are your views on the possible actions?**

**Q19. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q20. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q21. Do you think any of the existing actions need to be improved? If so, please provide details.**

Q 18. All possible actions are clear and will have a benefit to providing baseline data that will be essential in monitoring progress towards a healthier marine environment.

Q19. See answer to Q11.

All of the possible actions have a role to play.

Q 20. A standardised methodology of recording and monitoring would be beneficial with all data held by Marine Scotland.

#### Strategic Direction 5:

**Q22. What are your views on the possible actions?**

**Q23. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q24. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q25. Do you think any of the existing actions need to be improved? If so, please provide details.**

Q 22. A number of useful suggestions.

Q 23. See answer to Q11.

However national steering group looks like the most important action but all other actions should also be considered.

Q 24. More action is needed.

### **Option for delivery**

**Q26. Do you think that Option 4 is the most appropriate mechanism for developing and improving policies under the Marine Litter Strategy?**

Yes  No

**Any other views on the options outlined or other options not identified are also invited.**

No Comment

### **Equalities**

**Q27. Are there any equalities issues that should be factored into the Equalities Impact Assessment for the Marine Litter Strategy?**

Yes  No

No Comment

### **Strategic Environmental Assessment**

**Q28. Do you have any feedback on the findings of the Strategic Environmental Assessment?**

Yes  No

The ER appears to have been unavailable to view for the first 2 weeks of the consultation. Combining it with the litter strategy confuses the marine issues at times; perhaps a better layout may have helped. The topic of soil is scoped out yet numerous references are made to the impacts of litter on the seabed and associated benthos (e.g. sections 4.2.7; Figure 6, 4.3.2;

4.3.6; 6.4.1) and the importance of such habitats (e.g. 5.2.6). Section 6.2.1 lists the objectives of the National Litter Strategy but not the Marine Litter Strategy but the subsequent assessment discussed both; again confusing to elucidate which is which. Overall, reducing litter, whether it is terrestrial or marine, can on balance only be a good thing for obvious reasons therefore a 56 page document to state the obvious appears to add nothing extra of value to the Strategies.

### **Partial Business and Regulatory Impact Assessment (BRIA)**

**Q29. Are there any particular issues that you wish to highlight with regard to the partial BRIA, and the potential impacts on the third sector, business and the economy?**

Yes  No

No Comment

### **General**

**Q30. Are there other issues that have not been highlighted in this consultation that you would like to mention?**

Yes  No

No Comment