

## **An updated marine litter strategy for Scotland:**

### **Consultation response from the Advisory Committee on Packaging March 22<sup>nd</sup> 2022**

1. We applaud your ambition. We support your approach to reducing litter by focusing on specific subsets of litter, eg, marine litter, park litter.
2. We agree litter is bad for the environment and society. But we recommend that strategies and actions should be based on some estimates of the problem through data and then reduction through policy adopted.
3. While your marine litter survey of 2020 is useful, we would ask you to consider again if premises like most of marine litter being from land sources can be sustained. A TV documentary last year, *Seaspiracy*, claimed, eg, that plastic fishing nets formed the bulk of marine litter. We recommend a sample survey to quantify the state of affairs at least every three years.
4. While your suggestions in the strategy, eg, a communications plan, are well-meaning they appear to be general in intent. We recommend instead a clear strategy that can be monitored for its results and possible negative side-effects.
5. The best model for such a successful strategy is the car seat-belt campaign. Like litter the harmful action is committed by the citizen or consumer. But because citizens are so numerous and changing habits by just exhortation is neither easy nor quick, other actions are simultaneously necessary for positive effects. Thus, in addition to consumer communication, vehicle manufacturers were required to modify their products and enforcement mechanisms strengthened to penalise the small minority of consumers who still did not change their behaviour.
6. Similarly, in addition to research, we recommend three main planks for your strategy:
  - (I) Persuasion of beach and river or sea users to minimise litter,
  - (II) Annually grouping together manufacturers of, say, the top 10 marine litter items (possibly fishing nets, plastic bottles, aluminium cans, food wrappers, cigarettes, balloons and so on) into something like 'Extended Producer Responsibility' and asking them to organise and pay into a fund and then be responsible for litter collection in specified areas, subject to independent monitoring, and
  - (III) Not only increasing penalties for litter but asking owners of beaches, coasts and the like including local authorities and national parks to show results produced by each location by either directly or through contractors implementing a proxy of licensing for use and litter collection.

We support the polluter-pay principle but only by this sort of model could the state come close to getting marine users and polluting product-consumers to pay. In other policy-mixes tax-payers in general pay and in fact do not know they are paying.

7. Known main possible sources of marine litter, eg, sewage, should be reported on by regulators like the Scottish Environment Protection Agency every quarter. We are not convinced that enough is known about the effect of sewage discharges.
8. We feel plastic and metal litter might need greater focus given that they do not decompose as readily as, say, paper, but we would recommend considering better data based on research before any strategic action.

