

**Marine Conservation Society Response to the Scottish Government  
Marine Litter Strategy Dec 2021-March 2022 Consultation**

**Question 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?

**Strategic Direction 1 - Improve public and business attitudes and behaviours around marine and coastal litter, in co-ordination with the national litter strategy**

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Encourage positive behaviour and deter littering and flytipping.		X				
Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear.	X					
Improve waste management for collected marine litter		X				
Reduce sewage related debris through a		X				

behavioural change campaign.						
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**Question 2:** 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?

**Yes**

No

Don't Know

If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 1 (and any supporting evidence for this)?

Comments:

**Improve waste management in the fishing and aquaculture sector, by establishing systems to support the collection and recycling of gear.**

**Action 1**

The Marine Conservation Society recommends adding 'redundant Aquaculture gear' to action one following 'end of life fishing gear'.

We would also recommend, as part of the work to develop this waste management scheme, an extra focus on preventing gear being lost in the first place. This may also tie into the circularity work in action 2 on the CEN standard. Best Practise Guidelines to ensure Fisheries and Aquaculture gear is designed, stored and used need to reduce the risk of loss into the marine environment. Support for the industry must be provided as part of this work to ensure suitable measures or incentives are in place so a reliance on clean-up is not created.

Any opportunity for fishing or aquaculture litter to be recycled should be maximised not only for industry use but for the beach clean community where possible too. For example, the Odyssey Innovation project with the Welsh Government provides a scheme for stakeholders at both the local and industry level. The Odyssey Net Regeneration Scheme has also started in two places in

Scotland. To build on the scheme in Scotland all types of gear should be included that are used in Scotland as well as any gear that washes up as litter.

<https://www.odysseyinnovation.com/article/the-net-regeneration-scheme-goes-to-wales>

#### Action 4

Marine Conservation Society volunteers recorded an average of 595.3 pieces of litter per 100m on surveyed Scottish beaches (2015-2020 year-round data). It is often cited that 80% of litter has a terrestrial source and that 20% derives from activities that directly litter at sea. Our citizen science evidence identifies 12.7% of surveyed beach litter as from the fishing industry (2015-2020 data) indicating that improvements need to be made to reduce the amount of fishing gear lost at sea. Note that this percentage is lower than that calculated by the EU because 37.7% of beach litter recorded in Scotland by our volunteers is classified as “non-sourced”. In other words, the source of the plastic, metal or wood item from which a “non-sourced” piece derived can no longer be identified. The figure for fishing-derived litter is therefore likely to be considerably higher. The figure will also likely be higher as many beaches along the rural coasts of northeast and northwest mainland Scotland and the islands have such high volumes of litter, including fishing and aquaculture waste, that with our Beachwatch Survey methodology over 100m, or even 12m, it is not possible for volunteers in the usual timescales of up to two hours per survey to collect and record all litter present.

Where there is not the incentive to deliver waste onshore, there is an increasing probability of material being illegally and deliberately dumped at sea. Any passively fished waste collected in nets during fishing operations should be able to be delivered onshore without charge, and other waste direct from any fishing vessel, including gear and galley waste, should be covered by an indirect fee as outlined in the EU Port Reception Facilities Directive. The EU Port Reception Facilities Directive should be seen as the minimum standard to achieve. It outlines that *‘The Directive strengthens the financial incentive for delivery by providing for a 100% indirect fee for garbage (MARPOL Annex V waste) to be paid irrespectively (sic) of volumes delivered. This fee gives all ships a right to deliver all garbage waste, including waste fishing gear and*

*passively fished waste, without facing any further additional fees.* <sup>100</sup>

<https://g20mpl.org/partners/europeanunion>

Extended Producer Responsibility (EPR) should also be applied to fishing and aquaculture gear. Fishers who have passively fished waste are potentially utilising storage on board, particularly for any large nets recovered. The fishers should be compensated for this recovery of waste from the ocean. This refreshed Marine Litter Strategy has the opportunity to deliver a clear road map to reduce the amount of waste generated from fishing and aquaculture. There is a need to focus on reducing the amount of waste (and therefore litter) generated from these industries rather than just the, albeit welcome, collection of passively fished waste. We support the following recommendations in the "Mapping Economic, Behavioural and Social Factors within the Plastic Value Chain that lead to Marine Litter in Scotland: Commercial Fishing Gear" report, and strongly support them being implemented as soon as possible both in Scotland and throughout the UK:

1. Support education and engagement measures. Priority areas are engaging fishers on waste management options and the impacts of marine litter. Also advice on life cycle costs of more durable, repairable equipment to influence their procurement and design.
2. Evaluate feasibility and efficacy of EPR, recycling, and other waste management options a) Mandate reporting of products placed on market, and data on the collection and treatment of waste b) Understand current (baseline) waste management costs to fishers c) Evaluate EPR options for fishing gear d) Research recycling enablers and conduct cost-benefit analysis e) Gather industry views on 100% indirect fee, EPR and recycling measures in a combined consultation.
3. Support best-practice and new technology. There are a number of schemes and initiatives to tackle the wider issue of single use plastic and other marine litter including bans, charges, deposits, taxes and Extended Producer Responsibility.

<https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2020/02/mapping-economic-behavioural-social-factors-within-marine-plastic-value-chain-scotland/documents/summary-report/summary-report/govscot%3Adocument/summary-report.pdf>

## **Reduce Sewage Related Debris through a behavioural change campaign**

During the Marine Conservation Society's Great British Beach Clean 2021, an average of 38.4 sewage-related debris (SRD) items 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. With wet wipes consistently featuring in the top 10 number of litter items found on surveyed Scottish beaches over the last five years, we know that this is not a problem particular to the pandemic, but a chronic, long-term issue that needs to be tackled now.

The Marine Conservation Society therefore supports collaboration on a behaviour change campaign to help reduce sewage related debris as long as it is coupled with: Investment in the sewerage network to increase monitoring and reduce spills into the marine environment; and legislative action to ban certain single-use plastic items like wet wipes.

We would welcome an additional focus on reusables as part of this campaign, which would also help reduce mis-flushed items and be in line with circular economy ambitions.

A YouGov survey\*<sup>2</sup> of GB adults, conducted on behalf of the Marine Conservation Society in 2022, found of those people who had stopped flushing items that are not labelled as flushable down the toilet, 'information by a water company' was the top reason for stopping flushing (39%), followed by 'Information on TV' (35%), 'Other' (18%) and 'I no longer use the product' (15%) Encouragingly, 'I moved to reusables' was selected by (10%) as a reason for why they had stopped flushing products.

Reusables are a key component in achieving a circular economy so in the same YouGov survey, we asked respondents who use single-use wipes 'Which, if any, of the following would make you consider using reusable wipes more than you do now?' respondents were asked to select all that apply. Barriers to switching to reusables were highlighted around hygiene and costs:

- If I saved money by using reusable wipes (21%)
- If I knew more about how to ensure the same levels of hygiene (19%)
- If reusable wipes were more affordable to buy (19%)

We would recommend this information is used to help target communication channels for a behavioural change campaign and to add a reusable message as part of future behaviour change campaign work done through the Marine Litter Strategy with further work on removing the highlighted barriers to encourage a wider shift to reuse as part of a circular economy. This should include more information around hygiene and cost for the public including savings calculations.

\* All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 1,690 adults. Fieldwork was undertaken between 14th - 15th February 2022. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

**Question 3:** 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?

**Strategic Direction 2 - Reduce marine and coastal based sources of litter, with a focus on the most problematic sources, in coordination with land sourced litter being reduced by the national litter strategy**

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Reduce plastic pellet loss into the marine environment	X					
Improve the ability of the fishing industry to retrieve lost fishing gear from the sea.	X					
Reduce sources of sewage-related debris (SRD).	X					

**Question 4:** 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?

**Yes**

No

Don't Know

If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 2 (and any supporting evidence for this)?

Comments

Reduce plastic pellet loss into the marine environment

We would recommend that monitoring of plastic pellet loss should be considered under Strategic Direction 4, so supporting the actions here in Strategic Direction 2 to reduce plastic pellet loss into the marine environment. We need two types of monitoring - compliance and investigative monitoring. The former would provide evidence of the effectiveness of implemented measures, and would need to include upstream sampling as well as sampling in the marine environment. Investigative monitoring is needed to understand specific point sources e.g. from sewage waste-water discharge or particular factories or industrial sites. This would ensure that measures implemented are monitored for effectiveness, highlighting where measures are insufficient or lacking.

Improve the ability of the fishing industry to retrieve lost fishing gear from the sea

A recent report by community group Angus Clean Environments highlights that all governments of the UK should also be looking to reduce marine litter from any military activity happening in the marine environment as well as from fishing and aquaculture. The report demonstrated a lack of transparency and understanding of regulations and enforcement around the dumping of waste

by military vessels. We support the report's recommendation that there should not be an exemption for military vessels under MARPOL for military peacetime activities. We also support the recommendation that the obligations listed under the MARPOL Convention should be a legal duty and ask that all governments of the UK work to call for this change.

[https://www.aceangus.co.uk/\\_files/ugd/a102d6\\_6395c1bb8e92490b971e636d31eea970.pdf](https://www.aceangus.co.uk/_files/ugd/a102d6_6395c1bb8e92490b971e636d31eea970.pdf)

## Reduce Sources of SRD

### Action 1

We would recommend re-wording the action: *Investigate the potential for legislation to ban the manufacture and sale of wet wipes containing plastic, with a requirement that any alternatives meet the 'Fine to Flush' standard.*

*To: Investigate the potential for legislation to ban the manufacture and sale of wet wipes containing plastic, with a requirement that any flushable wet wipes meet the 'Fine to Flush' standard and all other wet wipes are clearly labelled 'Do not flush'.*

We would like to see this practical action implemented in the short term.

Manufacture of single-use wet wipes consumes a significant amount of resource and is carbon heavy, due to the transportation of wet material. Wet wipes are packaged in plastic, typically a flexible plastic which is usually not acceptable for recycling and, where it is, results in downcycling.

The development of the 'Fine to Flush' standard by the UK water industry, while helping to address the issue of flushable wipes which may be necessary for reasons of accessibility and quality of life, does not align with the circular economy. If all wipes were to be made to the Fine to Flush standard (currently flushable wipes make up the minority of the wet wipe market) this would increase the amount of material going through our sewer system. While the standard was designed for wet wipes passing through the system, we are not aware of any studies which show the effectiveness of the standard if there was a wholesale switch to the Fine to Flush standard.



The Marine Conservation Society therefore supports the ban on plastic wet wipes. However, we do not want an increase of 'plastic-free' flushable wipes that do not pass the Fine to Flush standard entering the market as a result. For example, there is no need for a floor cleaning wipe to be flushable but it could be plastic free and the current wording suggests it could or should be flushable. With a slight change in wording, it should be made clear that we are only talking about flushable wipes and not all wipes to meet the Fine to Flush standard. Furthermore, the Fine to Flush standard only tests whether it is physically suitable for the sewer system. It does not cover the impact of any chemicals. For example, cleaning wipes may have additional chemical additives which we would not want to introduce to the wastewater system as they may not be removed during treatment, or would end up in sludge used for agriculture.

### Action 2

The Marine Conservation Society welcomes the action to consider further policy actions to reduce sources of sewage related debris and hope to see support for the following policies to come out of this action:

- Supporting consumers to move to reusable products.
- Banning all avoidable single-use plastic in wet wipes and other sanitary items, such as tampon applicators, where alternatives exist.
- Applying Extended Producer Responsibility (EPR) to all sanitary products (not just those that contain plastic) to cover clean-up costs.
- Making the water industry's 'Fine to Flush' specification a legal requirement for flushable products.
- Improved labelling and consumer awareness to promote correct disposal. As a minimum this should include requirements from the EU Single Use Plastics Directive (e.g. a requirement for products to display 'Plastic in Product' and 'Do not flush' labels unless they have passed the water industry's 'Fine to Flush' specification).

### Action 3

The Marine Conservation Society welcomes action to improve monitoring of Combined Sewer Overflows (CSOs), but further ambition in the strategy should be considered to set progressive reduction targets for spills from CSOs (frequency, duration and harm) by the end of 2022, and to install electronic monitoring on all CSOs by 2024 (as a minimum this should include frequency

and duration of spills). This data should also be published on an annual basis to improve transparency.

[https://media.mcsuk.org/documents/MCS\\_Scottish\\_Parliamentary\\_Briefing\\_on\\_Sewage\\_Related\\_Debris\\_Nov\\_2021.pdf](https://media.mcsuk.org/documents/MCS_Scottish_Parliamentary_Briefing_on_Sewage_Related_Debris_Nov_2021.pdf)

The Marine Conservation Society has a data-sharing agreement set up with Scottish Water to share Beachwatch data. This helps to identify hot spots of SRD, informing operational and investment priorities. We will continue to share the data collected by our volunteers and encourage Scottish Water to act upon it. We would also welcome feedback on where data might still be needed so we can work with our volunteer network to complete further beach litter surveys through our Beachwatch Citizen Science project.

Scottish Water's Urban Waters Routemap highlights prioritisation of certain waters. We would encourage Scottish Water to work with members of the Marine Litter Strategy Steering Group to help with the identification of high priority waters to ensure work is happening where needed to restore and protect Scotland's marine environment.

The proposed number of new CSOs to be monitored is disappointingly low. For example, in Scottish Water's Urban Water Route Map it highlights that 630 CSOs are currently known to be causing SRD problems, which is much higher than the proposed number of 31 monitors in the short term.

<https://www.scottishwater.co.uk/About-Us/News-and-Views/2021/12/211221-Urban-Waters-Routemap>

#### Action 4

The Marine Conservation Society welcomes further monitoring of the network through the development of the Event Duration Monitoring programme. However, as mentioned above, the proposed number of new CSOs to be monitored in the long term is disappointingly low. For example, in Scottish Water's Urban Water Route Map it highlights that 630 CSOs are currently known to be causing SRD problems, which is much higher than the proposed number of 246 CSOs to be investigated for potential monitoring over the longer term. We would like to see much quicker action on installing monitors on a higher number of CSOs, as this is only the first step to identifying and rectifying problems in the sewer network, with the ultimate aim being reduction in spills and measures to stop SRD entering the environment.

<https://www.scottishwater.co.uk/About-Us/News-and-Views/2021/12/211221-Urban-Waters-Routemap>

#### Action 5

The proposed number of new screens for CSOs (29 screens) seems very low compared to the 630 CSOs that are currently known to be causing SRD problems, according to Scottish Water's Urban Water Routemap.

Although we believe that action should be focused on stopping spills from CSOs, since their impact is far wider than SRD, in the short-term screens are a practical measure to limit the harm being caused by their use.

#### Action 6

We welcome the proposed aesthetic and feasibility studies. The outputs from these studies should be publicly available and action should be taken as soon as possible with transparent progress updates. Results from previous studies on the Firth of Forth were shared in draft form by Scottish Water in-person, but were not then made clearly and publicly available in a timely manner when complete. In addition to *ad hoc* studies there is a need for a continual national program of monitoring of rivers for SRD to ensure that all CSOs of concern are identified and can be rectified in a timely manner.

We would also welcome Scottish Water and SEPA using Beachwatch data, as per the existing data sharing agreements, to identify hotspots or areas in need of an aesthetic and feasibility study.

**Question 5:** 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?

**Strategic Direction 3 - Support the removal of marine litter from the marine and coastal environment**

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
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Reduce the cost of disposal of collected marine litter	X					
Increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal		X				
Expansion of the Fishing for Litter project	X					
Support the installation of riverine litter removal technology in the River Clyde		X				

**Question 6:** 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)?

Comments

**Reduce the cost of disposal of collected marine litter and increase the number of rivers in Scotland with co-ordinated projects to reduce litter levels, including removal.**

The Marine Conservation Society would recommend a cost benefit analysis is done on these projects to ensure effort and funds are deployed for the highest environmental gain. We support both of these projects, but in order to assess impact for future investment an assessment would be required.

From speaking to volunteers and organisations based in the Western Isles, many face barriers to marine litter removal due to the amount of litter and the logistics of removing it from the beach and transporting it to a waste facility. As well as the monitoring action in Strategic Direction 4 for Scottish Islands, work to aid removal on remote and rural mainland beaches is also needed.

The Marine Conservation Society also anticipates an expansion to our Beachwatch beach cleaning and litter surveying citizen science project in Scotland through the recruitment of a Marine Conservation and Engagement Co-ordinator for the Moray Firth Coastal Partnership, the collaborative Restoration Forth project and the resumption of the seasonal Dornoch Firth Information Officer after a two-year hiatus due to the pandemic.

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

We would support the expansion to the Fishing for Litter project to increase recycling levels of gear and easy access to collection and recycling points. However, the cost of this must be borne through a comprehensive EPR Scheme.

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

The Marine Conservation Society welcomes innovation to aid the removal of litter from the marine environment and upstream sources. To ensure any new technology, such as a boom in the River Clyde, does not have any unintended consequences we recommend that this project has an environmental impact assessment completed before implementation.

**Question 7:** 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?

**Strategic Direction 4 – Improve monitoring at a Scottish scale and develop measures for strategy evaluation**

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Use of Fishing for Litter initiative data to evaluate industry engagement	X					
Accurate assessments of marine plastics in Scottish waters	X					
Development of an agreed methodology for inter-tidal microplastic monitoring	X					
Social science evaluation of the Marine Litter Strategy	X					
Understanding Scottish island beach litter	X					

**Question 8:** 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)?

Comments

### **Accurate assessments of marine plastics in Scottish waters**

The Marine Conservation Society would like to thank the thousands of volunteers who take part in our Beachwatch Project, which provides the data needed for OSPAR reporting. In Scotland, up to 2021, beaches were surveyed and cleaned four times a year, as per the OSPAR methodology. Data are submitted from beaches in Edinburgh, Fife, Inverclyde and Orkney. In consultation with Marine Scotland this list was updated in 2021 to include a stretch of Aberdeen beach as an open coast, North East beach as per the action listed in this strategy, as well as a beach in Oban, Argyll and Bute. The beach on Orkney was removed due to volunteers no longer being able to complete the surveys. We look forward to supporting our Beachwatch volunteers to keep gathering this important data for OSPAR monitoring as well as the wider network to highlight where further action may be needed.

### **Understanding Scottish island beach litter**

The Marine Conservation Society welcomes the focus on marine litter on Scottish Islands and would welcome support to add another OSPAR monitoring beach to a Scottish island location.

With many beaches across Argyll and Bute, Highlands and Islands, Aberdeenshire and Dumfries and Galloway reporting high levels of beach litter, any monitoring support for beaches with high levels of marine litter on Scottish Islands should also be shared with beach cleaners on mainland Scotland facing similar levels of litter.

It is worth noting that a separate monitoring scheme is being discussed, which could be due to the high volumes of marine litter. We would call for this to be in line with other data collection projects such as Beachwatch to ensure that consistent monitoring and accurate analysis across all of Scottish beaches is possible. Furthermore, since these beaches are requiring a separate

monitoring scheme due to such high levels of litter, it highlights the need for specific intervention and actions to be put in place.

**Question 9:** 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?

**Strategic Direction 5 - Maintain and strengthen stakeholder co-ordination in Scotland, the UK, EU and globally**

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know
Expand communications and understanding of Marine Litter Strategy work with delivery partners	X					
Build on and strengthen working relationships with wider UK	X					
Increase engagement with OSPAR through: participation in and implementation of the Regional Action Plan for Marine Litter; and taking a lead	X					



role with relevant actions.						
Strengthen co-ordination across the British-Irish Council region	X					

**Question 10:** 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?

**Yes**

No

Don't Know

If "Yes", please briefly specify any perceived gap(s) in planned actions under Strategic Direction 5 (and any supporting evidence for this)?

Comments

**Build on and strengthen working relationships with wider UK**

To effectively tackle the global issue of marine litter there must be consistent and effective collaboration across the UK nations. The Marine Conservation Society supports the building and strengthening of working relationships to ensure marine litter policies are put in place as soon as possible across the UK.

As highlighted in the National Litter and Flytipping Strategy Consultation on the Environmental Protection (Single-use Plastic Products)(Scotland) Regulations 2021 the UK Internal Market Act 2020 means that *'the ban will not apply to any items which are produced in, or first imported into, another part of the UK, and which are not banned in that part of the UK.'*

Urgent 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.

<https://www.gov.scot/publications/national-litter-flytipping-consultation/>

## Final Comments

**Question 11:** 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?

Comments

The Marine Conservation Society welcomes the revised Marine Litter Strategy for Scotland as well as the opportunities to feedback and help shape the new action plan through the review process and the Steering Group.

We will continue to work hard to support delivery of the relevant actions in the strategy and look forward to working with all sectors to reduce marine litter in Scotland.

Thanks to the thousands of Beachwatch volunteer citizen scientists who have helped gather important data on the beach litter levels across Scotland, we look forward to continuing to collect and use this data to help support and deliver the strategy and the actions it has highlighted. Our volunteers can only do this with the support of our staff, our membership and successful grant awards. We would welcome discussion with government and other stakeholder bodies around models that enable us to continue supporting and delivering the actions listed in the Marine Litter Strategy, including scope for additional resources and capacity-building.

With Scotland and the rest of the world facing the intertwined climate emergency and nature crisis, the Marine Conservation Society would welcome further scoping work on the impact of these crises on marine litter. For example, we could be seeing extra pathways to the ocean developing due to increased flooding impacting storm drains, or perhaps loss of gear or equipment from marine industries due to more severe storms. As the Strategy develops, consideration of the changing climate must be given to help identify potential increases in sources, emerging new sources or required changes to management of marine litter.

For further reading please see our previous consultation responses available on the MCS website: <https://www.mcsuk.org/ocean-emergency/ocean-pollution/publications/>

## Business and Regulatory Impact Assessment

To help us determine the impact of the policies/actions proposed in the consultation, we are interested to find out if these proposals would lead to increased costs and/or impact on resources for you or your business (if applicable). Any comments received will be used to inform the final Business and Regulatory Impact Assessment (BRIA) which would be prepared as part of the strategy development process.

**Question 12:** 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)?

**Yes**

No

Don't Know

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.

Comments

The Marine Conservation Society would welcome an Environmental Impact Assessment, as well as Business and Regulatory Impact Assessments, to accompany this and future consultations. These would help to ensure focus is put on the most effective interventions and policies.