

## Response ID ANON-NZ8F-CYKP-W

Submitted to Delivering Scotland's circular economy: a consultation on proposals for a Circular Economy Bill  
Submitted on 2022-08-16 16:12:36

### Strategic Interventions

#### Circular economy strategy obligation

Yes

2. Do you have any further thoughts on a statutory duty to produce a Circular Economy Strategy?:

The Marine Conservation Society would welcome a duty on Scottish Ministers to publish a Circular Economy Strategy every 5 years along with regular (at least annual) and transparent progress updates on the actions contained in each iteration of the strategy. These updates should include progress on actions within the strategy and need to be clear on who is responsible for delivering, reporting and enforcing. We would also call for inclusion of work in the marine sector including fisheries, aquaculture, chemicals and sewage works in these strategies linking where appropriate to other strategies or policy documents with clear information on who is responsible for delivering and enforcing different actions within the strategies.

Marine Conservation Society is a member of Scottish Environment LINK and agrees with the LINK response, to which we have input and are a signatory to, that such a Strategy should be on a par with the Climate Change Plan in terms of scrutiny. The Strategy must set out how consumption and other Circular Economy targets are going to be met including measures to address harmful materials and chemicals as well as obligations on different sectors. Sector level plans, including for farming, fishing and aquaculture, should be included as part of the Strategy and link to Just Transition Plans. Recognition and action around opportunities to increase green local jobs and increase green skills through development of Scotland's reuse sector should also be included. Deposit Return Schemes create more jobs than disposal and this should be similar for other waste streams<sup>1</sup>. An example could be reusable cups, even if the original product is made outside of Scotland once it has been imported it will remain in Scotland and local jobs will need to be created to run the reuse system. There also needs to be aligned investment for delivering and enforcing measures across the linked work areas.

#### References

1. <https://www.reloopplatform.org/wp-content/uploads/2021/02/DRS-Factsheet-Jobs-5FEB2021-1.pdf>

#### Statutory targets – consumption reduction, reuse and recycling

Yes

4. Do you have any comments in relation to proposals to set statutory targets?:

Marine Conservation Society Beachwatch Volunteers recorded an average of 346 items of litter per 100m of beach surveyed in Scotland during the 2021 Great British Beach Clean. More action is therefore clearly needed to move towards a Circular Economy to stop litter leaking into the marine environment. A survey conducted by YouGov for the Marine Conservation Society in 2022 found that three quarters of people in Scotland support Government action to transition to a circular economy (i.e., resources in use as long as possible, extracting maximum value from them, minimizing waste and promoting resource efficiency.), with only 2% of people opposed<sup>2</sup>. Both Scotland's seas and society would therefore clearly benefit from statutory circular economy targets. The Marine Conservation Society welcomes both the proposed Circular Economy Bill and Route map and supports the Scottish Government to be as swift, bold and ambitious as possible to fairly transition to a Circular Economy through setting statutory consumption reduction targets.

As members of Scottish Environment LINK we also agree with the LINK response to which we are signatories, that statutory consumption targets need to be set as soon as possible and there needs to be a commitment to do this by 2025 at the latest. New targets should include material and carbon footprint targets to drive policy to reduce our overall consumption of raw materials, especially those that have the biggest carbon impacts. These targets should also include leakage of materials from waste management systems such as microplastics shed from tyre abrasion and microfibres from clothes that enter the sewer network and treatment works. Investment and research into redesign of products that shed plastic will also be needed to address microplastic pollution.

Reusables are a key component in achieving a circular economy and we support a National Reuse Target. When responding to the consultation on the Marine Litter Strategy we highlighted that in a YouGov survey, when respondents who use single-use wipes were asked '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%)<sup>3</sup>

We would recommend this information is used to help target communication channels for a behavioural change campaign as well as evidence for a National Reuse Target and the work required to remove current barriers to reusables. This should include more information around hygiene and cost for the public including savings calculations.

The inclusion of a national reuse target is therefore also extremely welcome however we are concerned over the timescales to deliver the feasibility work and would call on the Scottish Government to work with reuse experts to establish a baseline of reuse in Scotland as soon as possible to set an ambitious target for national reuse.

#### References

2. Survey conducted by YouGov, on behalf of the Marine Conservation Society. All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 1,690 adults, of which 139 resided in Scotland. Fieldwork was undertaken between 14th - 15th Feb 2022. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

3. \* 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+).

#### Establishment of circular economy public body

Yes

6. Please provide evidence to support your answer to question 5:

As members of Scottish Environment LINK, we agree with the LINK response to which we are a signatory, recognising that transitioning to a circular economy is critical for many reasons as outlined in the consultation document. It therefore warrants a dedicated and fully accountable public body with the associated governance requirement.

7. If a Circular Economy public body were to be established, what statutory functions should it fulfil? :

As members of Scottish Environment LINK we agree with the LINK response to which we are a signatory that it is important that advisory, regulatory and delivery powers should be separated as set out in the Scottish Environment LINK publication Governance Matters<sup>4</sup>. We also agree that the Circular Economy public body should be an advisory body, like the Scottish Land Commission. Regulation and executive functions should be carried out by Scottish Government, Local Authorities and SEPA.

#### References

4. <https://www.scotlink.org/publication/governance-matters-the-environment-and-governance-in-scotland/>

#### Reduce and Reuse

##### Measures to ban the destruction of unsold durable goods

Yes

9. Do you have any comments in relation to proposals to ban the destruction of unsold durable goods?:

We agree with the Scottish Environment LINK response to which we are a signatory that the scope should be widened to include returned goods that are reusable.

10. Are there particular product categories that you think should be prioritised?:

We agree with the Scottish Environment LINK response to which we are a signatory that this should be implemented as widely as possible. If a phased approach is necessary, the product groups with the highest life-cycle carbon impact and other environmental and social impacts should be prioritised.

11. Are there product categories that should be excluded from such a ban?:

##### Environmental charging for single-use items

12. The previous consultation showed broad support for the proposal that Scottish Ministers should have the power to set charges for environmentally harmful items, for example single-use disposable beverage cups. Is there any new context or evidence that should be taken into account in relation to this proposal? :

The Marine Conservation Society still supports proposals for charges (as a behaviour change incentive) and that they should be considered for any single-use items, regardless of product or material, for which there are readily available and affordable re-usable alternatives that do not harm the environment.

Our Beachwatch data also demonstrates the big impact charges can have on reducing marine litter. Since the first carrier bag charge was introduced in Scotland in 2014, data recorded by Marine Conservation Society volunteers has revealed a drop of over 80% in the number of plastic bags picked up on

beach cleans. This example shows the power environmental charging can have and we hope to see a further decline in bags on beaches following the carrier bag charge rise to 10p.

There is also a need to focus environmental charging further up the supply chain or from business to business and not just at the consumer-facing point of sale. Costs, such as a potential charge on non-reusable goods further up the supply chain, should make reusable infrastructure the preferred option for businesses.

13. Do you have any further comments on how a charge on environmentally harmful items should be implemented? :

Environmental charging should not just be applied to public-facing products but could also be applied further up the supply chain in a business-to-business approach to support investment in more circular economy options.

Any income from the charges implemented under this enabling power should be used to support wider circular economy measures to reduce material consumption and pollution.

The charges also need to be clearly communicated as they are a reminder to do the alternative and should not be used as a money-making scheme.

As members of Scottish Environment LINK we also input to and are a signatory to the LINK response where we highlight that care needs to be taken to prevent consumers from switching to equally or more environmentally harmful alternatives due to charges. To avoid this may involve implementing parallel interventions that compliment the charge in achieving its aims. For example, if introducing a charge on single-use cups, there needs to be government led intervention to encourage a re-useable cup deposit scheme as well as banning single-use crockery and cutlery from closed settings. When a charge is implemented, it should be done so as comprehensively as possible.

The publication of the report by the Expert Panel on Environmental Charges and other Measures (EPECOM) supporting environmental charges alongside other interventions was published in 2019. Coupled with the fact that such interventions were consulted on previously for cups, and the urgency we face, secondary legislation should be introduced in this bill to implement environmental charges and complimentary interventions.

#### Mandatory reporting of waste and surplus

14. The previous consultation showed broad support for the proposal that Scottish Ministers should have the power to require mandatory public reporting of unwanted surplus stock and waste. Is there any new context or evidence that should be taken into account in relation this proposal?:

In a true circular economy waste should be minimal so reporting requirements should ultimately be applied to all waste and surplus over a certain quantity going forward.

Items with the highest life cycle environmental and social costs should be prioritised first alongside those with the highest re-use potential.

Clothing and all textiles should be included in reporting obligations as soon as possible, including online outlets and their reporting of waste and surplus mail order related packaging.

Bioresources from wild capture fisheries, aquaculture, agriculture and forestry sectors should also be looked at for early implementation of reporting waste and surplus.

As members of Scottish Environment LINK we also input to and are signatory to the response which recommends that mandatory public reporting is extended to supply chains to reveal more of the life-cycle impact of products and to encourage businesses to work with their supply chains to reduce waste. Given this was consulted on previously and the urgency of the climate emergency, secondary legislation should be introduced in this bill to implement the above measures.

15. The previous consultation showed broad support for the proposal that food waste should be a priority for regulations. Is there any new context or evidence that should be taken into account in relation this proposal?:

16. Are there other waste streams that should be prioritised? :

#### Chemicals

It is essential that the use of chemicals is properly considered in the design of a circular economy and should feature in the Route Map, crucially that the circular economy is safe and free from hazardous chemicals. Overall, it is necessary to improve transparency and traceability of harmful chemicals to ensure products are safe by design. For example, in some instances, chemicals intended for one purpose such as flame retardants in electronic equipment, have been recycled into other consumer products such as kitchen utensils or children's toys. Flame retardants are a by-product of their previous purpose, and through its new use, these chemicals are then included in products which shouldn't contain these chemicals, potentially posing a risk to health and/or the environment<sup>4</sup>. These considerations need to be included to ensure that a circular economy is safe and sustainable, and harmful chemicals are not just accumulating over time.

Importantly, we also should not simply replace a single-use plastic item with one made from a “biodegradable” alternative as this perpetuates our linear make-use-throw society instead of reuse. It is important to note that alternatives to plastic and polystyrene food packaging often include paper, card or moulded fibre products. In order to maintain a suitably water or greaseproof material, the packaging is often treated with a chemical from the PFAS group (per and poly fluoroalkyl substances)<sup>5</sup>. PFAS are a group of over 4,000 chemically similar compounds, often nicknamed ‘forever chemicals’ because of their extreme persistence in the environment. These paper and board alternatives to plastic are often marketed as compostable or recyclable. However, composting represents a direct source of PFAS to the environment, and once there, they can persist for thousands of years, longer than much of the plastic they replace. Research suggests that PFAS concentrations have now exceeded planetary boundaries and due to the “poor reversibility of environmental exposure to PFAS and their associated effects” scientists are recommending that “PFAS uses and emissions are rapidly restricted”<sup>6</sup>. Those PFAS that have been analysed are known to be bioaccumulative and harmful to both wildlife and human health, linked to a wide range of problems including immune, liver, kidney and blood functions in marine mammals<sup>7</sup>.

## Sewage

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 beaches in Scotland surveyed by volunteers, compared to only an average of 19.9 and 11 SRD items per 100m on beaches in England and Wales 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 beaches surveyed in Scotland 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 calls for action to increase 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.

The Marine Conservation Society therefore supports the ban on plastic wet wipes as highlighted in the consultation on an updated Marine Litter Strategy for Scotland. 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. 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.

We are also calling for Scottish Government to consider further policy actions to reduce sources of sewage related debris including:

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).

The Marine Conservation Society welcomed action to improve monitoring of Combined Sewer Overflows (CSOs) highlighted in the consultation on an updated Marine Litter Strategy, but further ambition from the Scottish Government is needed to tackle this waste stream and progressive reduction targets for spills from CSOs (frequency, duration and harm) should be set by the end of 2022, and electronic monitoring on all CSOs installed 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.

Under the section of the consultation paper concentrating on Littering and Improving Enforcement we welcome the outline of the work proposed and being worked on through the Marine Litter Strategy Action plan and the National Litter and Fly tipping Strategy both of which the Marine Conservation Society has contributed to. We would recommend that all policies and actions are cross-referenced with the Circular Economy Bill and Route Map. It is also crucial that there is integration with the Blue Economy Vision and Action Plan. For consistency, the vision and Action Plan should therefore also deliver a Circular Blue Economy.

## Sewage Sludge/Biosolids

Sewage sludge provides an excellent case study of why we must prioritise stopping pollutants at source if we are to achieve a clean circular economy. The treatment of wastewater generates sludge, a semi-solid material. In the UK, the large majority of treated sludge (also known as biosolids) is applied to agricultural land as a fertiliser. This is an example of the circular economy where a waste product is reused, providing benefits as a soil conditioner and a source of nitrogen and phosphorus. However, sludge is known to contain contaminants such as microplastics and PFAS, which currently cannot be removed during the treatment process and are highly persistent in the environment. If sludge is to continue being spread on agricultural land to support a circular economy, levels of contaminants must be controlled at source and outdated sludge regulations and monitoring must be updated to be fit for purpose. For example, to stop microfibres entering the waste water system from washing machines, machines must be fitted with microfibre filters, the use of intentionally added microplastics must be restricted (for example in all cosmetic and cleaning products) and all PFAS must be banned from all non-essential uses.

See the MCS sewage sludge paper for more information and recommended interventions:  
[https://media.mcsuk.org/documents/MCS\\_sewage\\_sludge\\_paper\\_june\\_2021\\_final.pdf](https://media.mcsuk.org/documents/MCS_sewage_sludge_paper_june_2021_final.pdf)

## DEEP Case Study

Transforming Scotland's economy into a truly circular one will require the bold regulatory and fiscal suggestions outlined in the Marine Conservation Society response and the Scottish Environment LINK response to which we are a signatory. However, progressive, environmentally and socially responsible businesses can of course introduce measures and business practices of their own volition that are environmentally and socially responsible and that move their own business models toward circularity. This not only makes social and environmental sense, but also good business sense. It is useful to highlight examples of good practice in the real economy that can inspire and encourage other businesses. We wanted to take the opportunity to highlight a good example of a business that was looking at its own internal waste streams, liquid, solid and heat.

The Dornoch Environmental Enhancement Project (DEEP), instigated by the Glenmorangie Company and of which the Marine Conservation Society is a proud founding partner with Glenmorangie and Heriot-Watt University. The Glenmorangie Company wanted to go far beyond legal compliance and so invested in a multimillion Euro Anaerobic Digestion Plant to reduce the chemical oxygen demand (COD) of their waste water by 95%. However, wanting to go even further the company wanted to actively help enhance the Dornoch Firth, inviting Marine Conservation Society and Heriot-Watt University as partners, together founding the DEEP project.

The DEEP vision is to reintroduce native oysters to the Dornoch Firth to help return the Firth to a previous richer ecological condition, to purify the final 5% of licensed distillery discharge and provide an exemplar for other native oyster restoration projects throughout Scotland, the UK and Europe. Since 2017, a total of 20,000 native oysters have been returned to the Dornoch Firth by DEEP. Initial results from Heriot-Watt University suggest the project is viable with the next milestone a total of 200,000 native oysters in the Firth by the end of 2023, and an ultimate goal of some four million native oysters covering around 40 hectares. Complex native oyster habitat can help export oyster larvae to the adjacent Moray Firth and provide nursery habitat for juvenile fish and other shellfish species.

Back onshore, the circular story continues, as the copper-rich solid waste from the anaerobic digestion plant, with copper coming from the whisky stills, is provided to local farmers who can use it to help fertilise the local fields, where the soil coincidentally is copper poor, and the heat captured by the digestion plant is recycled back into the distillery.

## References

5.

<https://www.sciencedirect.com/science/article/abs/pii/S0048969717321708#:~:text=BFR%20exposure%20via%20dermal%20contact%20with%20kitchen%20utensils>

6. <https://www.pfasfree.org.uk/wp-content/uploads/Forever-Chemicals-in-the-Food-%20Aisle-Fidra-2020-.pdf>

7. <https://pubs.acs.org/doi/10.1021/acs.est.2c02765>

8. Fair, P. A., et al. (2013) Associations between perfluoroalkyl compounds and immune and clinical chemistry parameters in highly exposed bottlenose dolphins, *Environmental Toxicology and Chemistry*, 32

## Recycle

Strengthening approach to household recycling collection services

17. The previous consultation showed broad support for the proposal that Scottish Ministers should have powers to place additional requirements on local authorities in order to increase rates and quality of household recycling. Is there any new context or evidence that should be taken into account in relation to the proposal?:

18. The previous consultation showed broad support for the principle that there should be greater consistency in household recycling collections. Is there any new context or evidence that should be taken into account?:

19. The previous consultation showed broad support for the principle of moving away from the current voluntary approach to Scotland's Household Recycling Charter towards a more mandated approach, whereby implementation of the Charter and its supporting Code of Practice becomes a statutory obligation. Is there any new context or evidence that should be taken into account?:

The role of targets to support recycling performance

Yes

Yes

22. Please explain your answer:

We agree with the Scottish Environment LINK response to which we are a signatory in support of these proposals, provided Local Authorities have sufficient resources to deliver the services in order to meet the targets.

The Duty of Care for households

23. The previous consultation showed broad agreement that householders' existing obligations are not sufficient. Is there any new context or evidence that should be taken into account? :

Yes

25. Please add any additional comments:

We also agree with the Scottish Environment LINK response to which we input and are a signatory that it is important to emphasise that such new powers must be exercised fairly and that additional needs people might have taken into account. Additionally, people need to have access to clearly identifiable recycling facilities, and products and bins must be clearly labelled in a consistent fashion.

Incentivising waste reduction and recycling (households)

26. Are there further powers, if any, for Scottish Ministers, and/or local authorities, that should be considered in order to incentivise positive household behaviours, to support waste reduction and increased recycling in Scotland?:

We are signatories to the Scottish Environment LINK response and note that LINK's ENGO partners in Europe are supportive of powers to introduce charges or other incentives to increase recycling and reduce household residual waste. Charges or other incentives are successfully used in many European countries however they should not be introduced until all households have access to comprehensive recycling infrastructure/ collection. They should be implemented fairly, for example, any standard charge associated with residual waste collection should be accompanied by a reduction in council tax.

We would also recommend ensuring sufficient powers are given to the relevant level of governance to help improve packaging reuse and refill through implementing the following policies:

1. Fees under Extended Producer Responsibility schemes should be weighted to reward reusable packaging where there is the power to do so in Scotland.
2. The Deposit Return Scheme should be built on to enable collection of reusable containers e.g. coffee cups
3. Ban the use of single-use products in eat-in settings where these can be reasonably replaced with reusable items.
4. Cut taxes on products and packaging sold as part of reuse and refill system activities where there is the power to do so in Scotland.
5. Set dissuasive monetary charges on the most polluting items to incentivise reusables, requiring proceeds to be used to support affordable reuse schemes.
6. Require public space developments and redevelopments to include water refill points.
7. Encourage comprehensive system changes to drive greater uptake of standardised reusable packaging by businesses.
8. Require large retailers to promote and incentivise reuse in store.

9. Set ambitious targets for the reuse of consumer packaging under EPR, with transparent monitoring and reporting to ensure targets are driving changes in packaging.

10. Review and strengthen eco design regulations to embed circular economy principles from the outset, before products enter the market.

27. Are there any other legislative measures that you consider Scottish Government should take to strengthen recycling and reuse at a household level, helping accelerate the rate and quality of household recycling in Scotland?:

Yes

28. Please add any additional comments:

We are a signatory to the Scottish Environment LINK response and therefore agree that local authorities should be required to facilitate increased re-use through a comprehensive re-use service driven by a 're-use charter'.

Business recycling collection zoning

Not Answered

30. Please add any additional comments::

Littering and Improving Enforcement

New penalty for littering from vehicles

31. The previous consultation showed broad support for the proposal that Scottish Ministers should have the powers to introduce a new fixed penalty regime for littering from vehicles. Is there any new context or evidence that needs to be taken into account? :

We are a signatory to the Scottish Environment LINK response and therefore agree that a fixed penalty regime for littering from vehicles is welcome and urge that this should extend to littering from boats at sea. As highlighted in the EU Port Reception Facilities Directive on their pre-2019 revision<sup>9</sup> on which the existing current UK legislation is based "discharges of waste at sea still occur at substantial environmental, social, and economic costs. This is due to a combination of factors, namely inadequate port reception facilities, enforcement often being insufficient and there being a lack of incentives to deliver the waste onshore". The Scottish Government needs to ensure that adequate port reception facilities are available but should also enforce penalties to prevent littering at sea. This was looked at in the updated Marine Litter Strategy Consultation and could be included to increase the impact of this legislative opportunity.

References

9. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0883>

32. The previous consultation showed broad support for the principle that the registered keeper of a vehicle bears primary responsible for offences such as littering from or in relation to their vehicle (for example by passengers or people using that vehicle at that time). Is there any new context or evidence that needs to be taken into account? :

Seizure of vehicles

33. The previous consultation showed broad support for the principle that enforcement authorities should be given powers to seize vehicles linked to waste crime. Is there any new context or evidence that should be taken into account?:

Assessing impact of bill proposals

Equality

34. Taking into account the accompanying EQIA, are there any additional likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to the 'protected characteristics' listed above?:

Business and regulation

35. Taking into account the accompanying BRIA, do you think that the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any business or sector? :

Children's Rights and Wellbeing Impact Assessment

36. Taking into account the accompanying CRWIA, do you think that the proposals contained in this consultation are likely to have an impact on children's rights and wellbeing? :

Islands Communities Impact Assessment

37. Taking into account the accompanying ICIA, do you think that the proposals contained in this consultation are likely to influence an island community significantly differently from its effect on other communities in Scotland? :

#### Fairer Scotland Duty

38. Taking into account the accompanying Fairer Scotland Assessment summary template, do you think that the proposals contained in this consultation are likely to have an impact in relation to the Fairer Scotland Duty? :

#### Environment

39. Do you think that the proposals contained in this consultation are likely to have an impact on the environment? :

Financial interventions have been shown to be highly effective. For example, the carrier bag charge introduced in 2014 in Scotland resulted in a reduction from 17 bags per 100m recorded in 2013 to only 3 in 2021 (data from MCS Great British Beach Clean 2021 September survey). Policy interventions such as Deposit Return Schemes are known to be highly effective in changing behaviour<sup>10</sup>. As well as the upcoming Scottish scheme for bottles and cans, this intervention can be applied to other items such as cups and in specific settings such as festivals. It is also worth noting the positive impact other policy changes have on litter reduction, such as the ban on single-use plastic cotton bud sticks. Marine Conservation Society data provided evidence that helped make the case for banning the manufacture and sale of plastic cotton bud sticks, regulations for which came into force in October 2019 in Scotland. An average of 10 plastic cotton bud sticks were recorded per 100m of beach surveyed by volunteers in Scotland during the 2021 Great British Beach Clean, a 50% drop from the 2020 event, where an average of 20 were recorded on Scotland's surveyed beaches.

Proposed charges should have a positive impact on the environment through reducing the use of single use beverage cups and an associated reduction in litter and waste. However, the extent that it will result in an overall reduction in material and carbon footprint, depends on reusable alternatives being readily available and used many times. The impact of charges will be enhanced if they are accompanied by reusable cup schemes, ideally with a uniform cup.

We also support the running of a national communications campaign focussed on sustainable consumption and we would be happy to be involved in the design and implementation of the campaign, especially in how it relates to Scotland's seas.

#### References

10. <https://www.reloopplatform.org/wp-content/uploads/2021/06/DRS-Litter-Fact-SheetSummary-14June2021.pdf>

#### Conclusion

40. Do you have any other comments that you would like to make, relevant to the subject of this consultation, that you have not covered in your answers to other questions?

please specify:

#### About you

What is your name?

Name:  
Catherine Gemmell

What is your email address?

Email:  
catherine.gemmell@mcsuk.org

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:  
Marine Conservation Society

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)



We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: