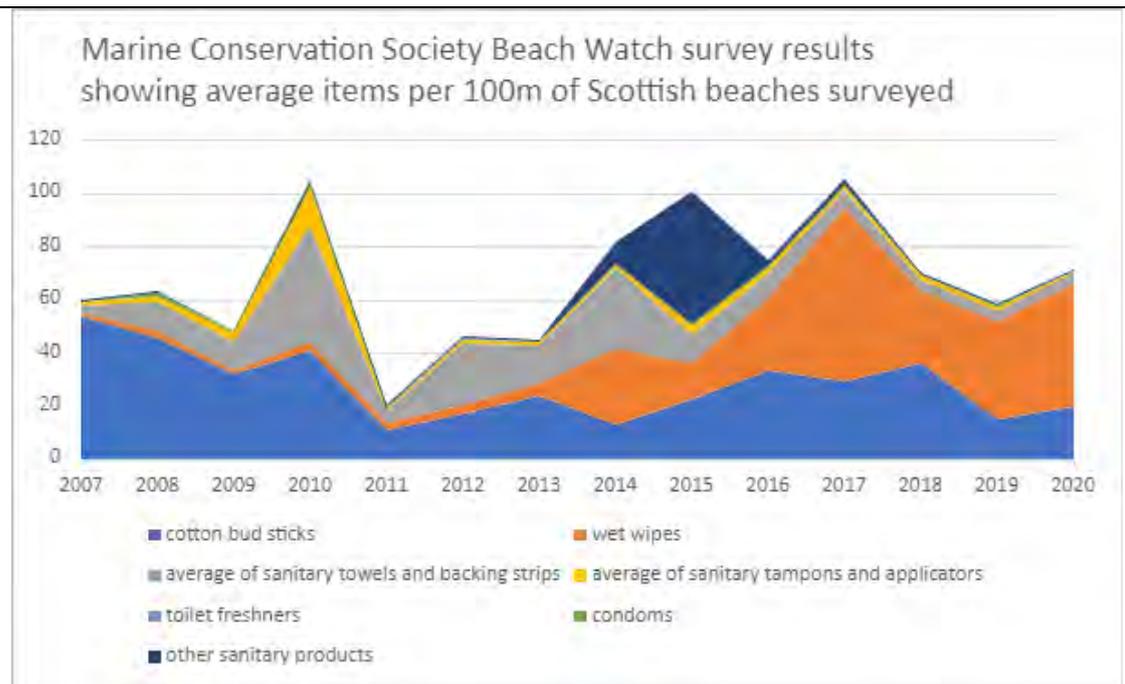


OSPAR - Development of the new Marine Litter Regional Action Plan (MLRAP)

a.	What themes do you think OSPAR should work on under a new RAP ML?
<p>Scottish Water recognises the importance of all the proposed themes. Those most closely linked to Scottish Water activities and operations, that take place in the near shore area, are as follows: -</p> <p>F Land based: Waste management G Land based: Wastewater and storm water management H Riverine input of marine litter</p> <p>We consider it would be useful to align the OSPAR MLRAP with the revised Urban Wastewater treatment Directive (UWWTD), particularly in relation to wastewater and storm water management and microplastics.</p>	
b.	What specific actions do you recommend that OSPAR consider and why?
<p>These comments are relevant to section G wastewater and storm water management under the Theme B: Measures to combat land-based sources.</p> <p>Over the last 13 years there has been a significant change in items recorded in beach litter surveys in relation to sewage related debris (SRD). Wet wipes (the majority of which contain plastic) have become the most common SRD item recorded on Scottish beaches.</p> <p>The 2019 OSPAR maritime area survey records 90% of litter contains plastic and The Single Use Plastic (SUP) Directive has made significant steps to address the 10 most common single use items littered on European beaches. As plastic will persist in the environment for hundreds of years, fragmenting and forming microplastics, further action needs to be taken in OSPAR MLRAP for 2020-30, with a focus on tackling SUP at source to reduce SRD entering the environment.</p> <p>Beach litter in Scotland data provided by the Marine Conservation Society (MCS), is presented in graph form below. These data illustrate the issue of wet wipes, which accounted for 64% of SRD in 2020 on Scottish surveyed beaches and demonstrates the need to tackle wet wipes in the next MLRAP.</p>	



Scottish Water recommends the following actions be considered and supported to combat land-based sources of marine litter through control at source.

- Ban on single use items containing unnecessary plastics, such as wet wipes, plastic tampon applicators and plastic cotton bud sticks.
- Clear labelling of items containing plastic that are likely to be flushed and other items likely to be flushed, e.g., wrapping. Information on the labelling should include whether the item contains plastic, harms the environment if flushed and whether it should be disposed of in the bin.
- Adoption of a universal flushability standard, we consider that current labelling of items as “flushable” is misleading consumers. The Water Research Centre (WRc) “Fine to Flush” standard means that the product does not contain petro chemical derived plastic fibres and that it has passed a stringent set of tests to prove that it will break down in the sewerage system, therefore reducing SRD levels and likely effects on the environment. All products that do not meet this universal flushability specification should be marked as “DO NOT FLUSH”.
- Introduce Extended producer responsibility - Scottish Water considers extended producer responsibility (EPR) should be implemented in relation to wet wipes containing plastic and any other item likely to become SRD. We propose that wet wipes that have met the WRc “Fine to Flush” standard should be exempt from EPR.
- Clear labelling of items likely to be littered which could enter surface water such as personal protective equipment, for example face masks, which should be labelled with please dispose of to the bin

c What else do you think should be included in the new RAP?

Scottish Water considers that the effectiveness of the OSPAR RAP would benefit

from cross-referring to the other Marine RAPs, for example, co-ordination with HELCOM etc. We consider that a consistent approach to beach and/or marine litter monitoring and recording, including determination of a baseline, is essential to assess progress.

d

On what issues should OSPAR cooperate with your organisation in particular?

The Scottish Water new customer awareness campaign is being developed, as part of this work we wish to work with other organisations in terms of consistency of message and approach this issue. We have been carrying out an insight and creative survey to find out how customers perceive the proposed content for the campaign. This work was conducted early summer 2021 and following feedback we are developing the campaign to make it more impactful to protect the sewerage network and the environment.