

## Marine Conservation Society response to the Scottish Government National Litter and Flytipping Strategy

<https://consult.gov.scot/environment-forestry/national-litter-and-flytipping-strategy/>

**1.(a) Do you support the proposed action to conduct research to understand the full range of influences on littering behaviours (action 1.1)?**

**Yes / No / Do not know**

**(b) Please give reason(s) for your answer.**

The Marine Conservation Society would welcome Scottish-specific research on influences of behaviour to provide potential evidence for interventions at government, industry and public levels.

We would also recommend research into the impacts of both littering and fly-tipping on the environment. Work should be commissioned / relevant organisations funded to undertake work into studies of the impacts. An increased understanding of the impacts will help identify the most appropriate prevention and recovery strategies.

**2.(a) Do you support the proposed action to develop and adopt a national anti-littering behaviour change campaign (action 2.1)?**

**Yes / No / Do not know**

**(b) Please give reason(s) for your answer**

The Marine Conservation Society would support the development of a national anti-littering behaviour change campaign, but it is crucial that this is developed alongside and complements essential, urgent and fundamentally important policy interventions such as Extended Producer Responsibility schemes, market restrictions and labelling requirements. Under the upcoming EPR scheme, due to be implemented in 2024 for plastic packaging, we welcome the Scottish Government's continued commitments to the inclusion of litter payments, thus ensuring that EPR covers the cost of littered plastic packaging. Litter payment charges could be reduced for companies who take steps to reduce the likelihood of plastic packaging ending up as litter. Actions could include better design, labelling or return schemes and infrastructure.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1063589/epr-consultation-government-response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063589/epr-consultation-government-response.pdf).

We would also recommend clear source to sea messaging to ensure both terrestrial and beach litter is included.

### **3. Which topics should be a priority to address by behaviour change interventions?**

The Marine Conservation Society would recommend that behaviour change interventions should be prioritised based on evidence and upcoming legislative change. For example, we would recommend that a national behaviour change campaign should be developed and implemented in the run up to and during the first year of Scotland's Deposit Return Scheme for plastic and glass bottles and metal cans to ensure higher levels of engagement and success rates for returns. We know there is high public support for Scotland's all-in (glass and plastic bottles and metal cans) Deposit Return Scheme and an awareness campaign on when it starts and how to use it would further its success.

Priority should also be given to areas where national campaigns are already developed such as the current Nature Calls campaign by Scottish Water. Data from our Great British Beach Clean event in 2021 showed an average of 38.4 Sewage Related Debris (SRD) items (wet wipes, sanitary pads (period and incontinence), tampons, tampon applicators and nappies) 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. We would therefore recommend that support for the Scottish Water Nature Calls campaign continues alongside interventions linked to reducing Sewage Related Debris such as supporting reusable products, encouraging responsible flushing behaviour and increased labelling of products. Behaviour change campaigns linked to Nature Calls and our highlighted suggestions would have to be in parallel to the implementation of an effective ban on plastic wet wipes as well as increased monitoring and screening of Combined Sewer Overflows across Scotland.

Further behaviour change and policy interventions also need to be delivered to reduce cigarette littering. Year on year, the Marine Conservation Society's Great British Beach Clean finds cigarette stubs among the top 10 most common forms of litter on Scottish beaches. In 2021, an average of 9.4 cigarette stubs were found for every 100 metres of surveyed Scottish beach, making them the 10th most common litter item. During the 2020 Great British Beach Clean, cigarette filters were the 7th most common form of litter found on Scottish beaches (7.5 / 100m). Despite the impact they have on the environment they are not widely recognised as being part of the plastic problem with fewer than half of smokers aware that they contain plastic, according to a survey by Keep Britain Tidy.

<https://www.keepbritaintidy.org/news/its-flicking-blue-murder>

In 2020 the Marine Conservation Society signed a joint statement with ASH Scotland and Keep Scotland Beautiful calling on the Scottish Government to take action on single use plastic cigarette filters.

[https://www.ashscotland.org.uk/media/841075/joint\\_statement\\_on-plastic-filters-05112020.pdf](https://www.ashscotland.org.uk/media/841075/joint_statement_on-plastic-filters-05112020.pdf)

Awareness raising around cigarettes containing plastic should be prioritised to reduce littering of smoking related litter as well as the introduction of a ban on single use plastic filters.

Another priority, based on our Beachwatch data, is soft plastics. Soft plastics like Plastic packets (crisp, sweet, lolly (inc sticks), sandwich etc) were third in the Marine Conservation Society Great British Beach Clean 2021 list of items recorded, with an average of 19.4 pieces found per 100m survey stretch. Furthermore, volunteers recorded Personal Protective Equipment (PPE) on 33% of the 129 beaches surveyed in Scotland.

**4. Is there a need to develop a standard definition for litter that can be used across Scotland?**

**Yes / No / Do not know**

**5. Do you support the following proposed actions to:**

**• Action 3.1: Review available litter data and reach an agreement between stakeholders on a common approach to data collection?**

**Yes / No / Do not know**

The Marine Conservation Society has run the Citizen Science project Beachwatch for nearly 30 years to monitor litter levels on beaches throughout the UK, harnessing the enthusiasm and dedication of thousands of volunteers. The methodology used is in line with the OSPAR beach litter monitoring guidelines. Due to the longevity, legacy and ongoing commitment of the Beachwatch project to UK and OSPAR monitoring, the method of beach litter data collection would not be able to be drastically changed. We would therefore recommend that any new terrestrial-based data collection methodology is developed to ensure that the datasets are comparable.

<https://www.ospar.org/work-areas/eiha/marine-litter/assessment-of-marine-litter/beach-litter>

**• Action 3.2: Identify commonly littered items and litter hotspots and work with local authorities to develop targeted interventions?**

**Yes / No / Do not know**

The Marine Conservation Society has multiple data sharing agreements set up with various Scottish Local Authorities, public bodies and academic institutions as well as the Scottish Government itself. Once a data sharing agreement has been signed, the data are provided free of charge to enable relevant interventions based on the Beachwatch data as evidence.

For example, Scottish Water have a data sharing agreement set up with us and use the data to help identify hot spots of sewage related debris. This enables targeting of local action, shaping of national campaigns and also provides evidence for future investment.

Other examples have included Local Authorities using Beachwatch data as evidence for policy interventions such as banning balloon and lantern releases on Local Authority owned land. Local data may help highlight hotspots of other types of litter such as cigarette litter to help target interventions. We would welcome setting up data sharing agreements with any Local Authority or public body that could use our data for local interventions.

**•Action 3.3: Increase the use of citizen science to support data on the amount and composition of litter?**

**Yes / No / Do not know**

**(b) Please give reason(s) for your answer.**

As Beachwatch provides the largest known data set of beach litter for Scotland, we would welcome support to expand the project into areas where we have gaps in our data. We would also welcome a terrestrial-based version that can be analysed alongside Beachwatch data to demonstrate the interventions needed along the source to sea journey that some litter takes. However, citizen science should not be seen as an 'easy' or 'cheap' answer to monitoring litter. It should be appropriately funded and supported through a comprehensive Extended Producer Responsibility Scheme.

It is worth noting that the UK Government Department of Environment and Rural Affairs gives funding to the Marine Conservation Society for statutory monitoring for OSPAR beach litter reporting. We would recommend statutory monitoring of terrestrial litter should be done and should align with current statutory beach litter monitoring. If completed through a citizen science scheme, this again would need funding or could be regulator led.

We also welcome the clear ties to the Marine Litter Strategy and would recommend any litter database is shared or connected to the two strategies so both marine and terrestrial litter can be analysed in the round. This is important to ensure that all litter data are systematically recorded in both inland waters and coastal locations in a complementary way. This would also ensure that all the data contribute to overall litter analysis and policy development and do not fall through any gaps between the two strategies.

**6.What would encourage increased participation in citizen science data collection?**

The Marine Conservation Society would recommend referring to the 10 principles of Citizen Science paper by Robinson L.D. et al (2018) during the design or review of any citizen science project.

<https://www.sei.org/publications/ten-principles-citizen-science/>

In designing a new project, we would recommend involving the public in all aspects of project design and as early as possible - including setting the scientific question and collaborating with scientists to create methodologies that are both easy to carry out and robust enough to collect credible data. It is also vital to carry this through to any scientific reporting and writing with appropriate collaboration and credit given to the citizen scientists themselves.

We would also recommend high levels of effective communication and sharing with participants throughout the entire project. There should be particular focus on the sharing the scientific reasoning or project question with open and honest feedback about the results provided in an accessible way.

Focus must also be given to the fact that most citizen scientists will be volunteering their time and effort to the project. The data collection should be as fun and easy to take part in as possible which can be aided with accessible training resources and engaging web content. These should include recorded videos as a minimum, but we would recommend live webinars or in person training and discussion sessions so volunteers feel valued and have time to fully understand the project and the data collection. For example, in Beachwatch we have now developed an App that can be used on mobile devices for recording litter as well as the traditional paper forms to improve accessibility to the project.

<https://www.mcsuk.org/beachwatch-app/sign-in/>

We welcome Beachwatch being highlighted as a citizen science data collection best practice example in this consultation paper, and would like to thank the thousands of volunteers who make it a success. We would welcome being involved in discussions around citizen science project development, especially for monitoring schemes for highly polluted beaches where volunteers are unable to follow the Beachwatch and OSPAR methodology.

#### **7.(a) Do you support the proposed actions to:**

- Action 4.1: Review CoPLaR(2018) and its implementation by duty holders?**

**Yes / No / Do not know**

- Action 4.2: Explore the use of flexible and innovative interventions to support litter prevention and removal?**

**Yes / No / Do not know**

**•Action 4.3: Establish an action focused group to encourage collaboration and share best practice between local authorities, national parks and other duty bodies?**

**Yes / No / Do not know**

**(b) Please give reason(s) for your answers**

The Marine Conservation Society would welcome the use of flexible and innovative interventions as well as increased collaboration through a focus group. We would recommend that impact analysis and reviews should be done for each intervention so appropriate scaling or investment can be directed to the interventions with the most successful impacts on reducing litter.

We would encourage collaboration between stakeholders involved in both the Marine and the Terrestrial Litter Strategies to ensure best practice can be shared and supported.

**8. Please provide examples of flexible or innovative interventions that have or have not worked well.**

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.

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

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 supported Scotland's banning of the manufacture and sale of plastic cotton bud sticks in October 2019. An average of 10 plastic cotton bud sticks were recorded by volunteers in Scotland during the 2021 Great British Beach Clean, dropping 50% from last year's event, where an average of 20 were recorded on Scotland's beaches.

Spatial mapping of litter would also be a useful information source for supporting decisions on behaviour change interventions and for policy makers. Any new technology, including software, should be accompanied by suitable training and funding. Learning could be taken from the SCRAPbook Project by the Moray Firth Coastal Partnership, UK Civil Air Patrol and the Marine Conservation Society to explore other innovative partnerships, as well as use of aerial photography for identifying litter hot spots. This project also highlights the need for support for litter removal where some areas highlighted from the air proved difficult to

access on the ground. Hence, innovative survey techniques need to be linked with practical removal.

<https://www.morayfirth-partnership.org/marine-litter>

Innovative projects such as the Beachwatch Bute beach cleaning bench project should be expanded out to other areas and support for the removal of collected litter and the infrastructure required should again be provided through an EPR scheme.

<https://www.scottish-islands-federation.co.uk/new-project-to-tackle-marine-litter-at-beachwatch-bute/>

### **9. How can increased collaboration and information sharing across local authorities, national parks and other duty bodies be achieved?**

The Marine Conservation Society would recommend following a similar model to the Marine Litter Strategy Steering Group, which was set up with key stakeholders delivering actions within the strategy meeting several times a year to discuss progress and encourage collaboration. Updates were shared via email as well as face to face, and online meetings and were useful to maximise opportunities to work together.

### **10.(a) Do you support the proposed actions to:**

• **Action 5.1: Create a national litter hub to provide information to community groups?**

**Yes / No / Do not know**

• **Action 5.2: Create a community-focused litter education programme?**

**Yes / No / Do not know**

### **(b) Please give reason(s) for your answer.**

The Marine Conservation Society would support the creation of a national litter hub and a community focused litter education programme. However, this would need specific funding and support to be able to be run efficiently and effectively on a continuous time scale. Regular work with stakeholders would be required to keep the hub and programme up to date, current and accurate.

We would again recommend liaison with the Marine Litter Strategy Steering Group to ensure the source to sea story is told effectively, as well as having useful actions for coastal communities.

We would welcome inclusion of our Education and Youth Engagement resources, which can be found on our website, in the hub. Signposting to our in person and online classes,

workshops and opportunities to take part in beach cleans and other activities would also be welcome.

<https://www.mcsuk.org/what-you-can-do/fun-learning/>

### **11. What advice, information and support should be included in a national litter hub?**

The Marine Conservation Society Beachwatch resource web page could be a useful template for those seeking to do beach cleans and citizen science and could be adapted for terrestrial versions.

<https://www.mcsuk.org/what-you-can-do/join-a-beach-clean/useful-guides-and-resources/>

We would recommend sign posting as much as possible to already established resources.

Other useful resources could include:

- Local contacts for accessing litter picking equipment and post clean up removals
- Pollution reporting hotlines
- Health and Safety guidelines
- Local stakeholder groups that may wish to support or promote, including Local Coastal Partnerships and Local Biodiversity Partnerships

### **12. What topics should be included in a community-focused litter education programme?**

The Marine Conservation Society has several education offerings which link to litter and can be found on our website. Our Education and Volunteer and Community Engagement teams use these to engage a wide variety of people through the formal education system, as well as through youth and wider community engagement. We would welcome sign posting to these resources and opportunities for in person or online sessions by staff and volunteers at the Marine Conservation Society within this programme.

<https://www.mcsuk.org/what-you-can-do/fun-learning/>

We would recommend a focus on how the messages of a circular economy, like repair and reuse, link to littering, as this appears to be a gap in currently available education resources.

With many resources currently available for primary schools, we would also recommend a focus on secondary schools and the wider community as part of this community education programme. It would also be important to link the other actions in this strategy, such as the research into littering behaviour, to this programme. Greater success could be achieved if



specific resources were created linked to specific issues, so communities could make it relevant to their experience and situation.

Finally, we would highlight the importance of co-designing these resources and the whole programme with stakeholders from the target audiences.

**13.(a) Do you support proposed actions on enforcement of litter offences to:**

•**Action 6.1: Conduct an evidence review of barriers to enforcement?**

**Yes / No / Do not know**

•**Action 6.2: Explore raising current fixed penalty notice amounts?**

**Yes / No / Do not know**

•**Action 6.3: Explore potential alternative penalties to monetary fixed penalties?**

**Yes / No / Do not know**

**(b) Please give reason(s) for your answers.**

We would welcome the review to explore an increase to fixed penalty levels. These penalties should be proportionate to the content and quantity found littered / fly-tipped and the need to cover the clean-up costs covered by Local Authorities (LAs) The fine amount should also reflect the hazardous and environmentally persistent nature of the content, as well as size and quantity. In addition to proportionate penalty fees, a 'baseline' minimum penalty should ensure that the penalty outweighs any potential profit and deters future fly-tipping. This is particularly important for "commercial" fly-tippers that are potentially making huge profits through illegal disposal.

While certain enforcement approaches should remain consistent across all LAs (i.e., fixed penalties and fines), additional enforcement actions should reflect the needs of the LA e.g., more awareness raising campaigns which might mean a differences in applying the range of enforcement measures across Scotland.

**14.(a) Do you support the proposed action to review and further develop guidance on enforcement best practices (action 7.1)?**

**Yes / No / Do not know**

**(b) Please give reason(s) for your answer.**

The Marine Conservation Society supports the proposal to review and further develop guidance and would recommend this is done with close consultation with those who carry

out enforcement on the ground. When attending workshops with Local Authorities on litter the challenge of enforcement has always been mentioned, and any support, whether that is funding, training or guidance, should be given where necessary.

**15.(a) Do you support the proposed action to conduct research to understand behaviour that leads to flytipping (action 8.1)?**

**Yes / No / Do not know**

**(b) Please give reason(s) for your answer.**

The Marine Conservation Society supports research to understand behaviour that leads to fly-tipping and would also recommend looking at cases of domestic or individual fly-tipping separately to 'commercial' fly-tipping. Fly-tipping is likely to occur on a much less frequent basis per individual than littering, and motivations often differ. Commercial fly-tipping is a very different issue, in the sense that acts are largely driven by economic savings through disposal fee avoidance or making commercial profit.

**16.(a) Do you agree with the proposed actions to:**

•**Action 9.1: Develop a sustained, evidence based, national anti-flytipping behaviour change campaign?**

**Yes / No / Maybe**

•**Action 9.2: Create a single information point containing advice on disposal of commonly flytipped materials?**

**Yes / No / Maybe**

**(b) Please give reason(s) for your answer.**

The Marine Conservation Society supports the development of a national anti-flytipping behaviour change campaign and recommends that 'commercial' fly-tipping and one off 'domestic' fly-tipping are treated separately. The research mentioned in question 15(a) should be used in the development of this campaign.

We would also support the creation of a single and accessible information point containing advice and support for the responsible disposal of commonly fly-tipped materials.

**17.Are there topics that should be a priority to address in behaviour change interventions?**

**18.What information should be included in the single information point?**

The Marine Conservation Society recommends fully accessible information on the responsible disposal of the most commonly fly-tipped items.

19. Is there a need to develop a definition of flytipping that can be adopted across Scotland? **Yes** / No / Do not know

20.(a) Do you support the proposed actions to:

• **Action 10.1: Create a data sharing agreement to support gathering of data and work with stakeholders to improve consistence of data collection?**

**Yes** / No / Do not know.

As mentioned above, the Marine Conservation Society Beachwatch Project holds several data sharing agreements with different stakeholders across Scotland, primarily on litter. However, we do collect information on items that are categorised under its' source as 'fly-tipping'. We would be happy to share this information and the way it is collected to help with this action.

[https://media.mcsuk.org/documents/19\\_MCS\\_Litter\\_Sources.pdf](https://media.mcsuk.org/documents/19_MCS_Litter_Sources.pdf)

We also believe there is the potential that fly-tipping on private land is under-reported. It would be good to enhance data collection surrounding this, such as adopting the mapping method previously mentioned.

• **Action 10.2: Explore incorporating data into a national database?**

**Yes** / No / Do not know

• **Action 10.3: Review the Dumb Dumpers system and ensure a fit for purpose mechanism for citizen reporting of flytipping exists in Scotland?**

**Yes** / No / Do not know

• **Action 10.4: Explore the development of a live picture of flytipping across Scotland?**

**Yes** / No / Do not know

(b) Please give reason(s) for your answers.

The Marine Conservation Society recommends a review of the national reporting tool for fly-tipping but would call for the name of the tool to be changed with the removal of the word 'Dumb'.

21.(a) Do you support mandatory reporting of flytipping incidents for statutory bodies?

**Yes** / No / Do not know

(b) Please give reason(s) for your answer.

**22.(a) Do you think we should continue to use Dumb Dumpers as the national reporting tool?**

**(b) Please give reason(s) for your answers.**

The Marine Conservation Society recommends the continuation of a national reporting tool for fly-tipping but would call for the name of the tool to be changed with the removal of the word 'Dumb'.

**(c) What are barriers to reporting flytipping incidents that occur on private land?**

**(d) Who would you report flytipping to?**

For the Marine Conservation Society Beachwatch project we include a section on fly-tipped waste in our template risk assessment that is available for volunteers to tailor to their specific location. The template text also includes advice on asbestos:

*'If there is an accumulation of waste which would obviously have been fly-tipped deliberately on site, then this should be left alone and the relevant local authority with responsibility for fly-tipping clearance informed. It is possible that asbestos could be found amongst smaller accumulations of litter that may not appear to be fly-tipping. A simple asbestos ID chart can be found on the HSE website here: <http://www.hse.gov.uk/asbestos/gallery.htm>'*

<https://www.mcsuk.org/what-you-can-do/join-a-beach-clean/useful-guides-and-resources/guides-and-resources/#risk-assessment-template>

**23.(a) Do you agree with the proposed actions to:**

•Action 11.1: Support and encourage information and resource sharing between stakeholders?

**Yes / No / Do not know**

•Action 11.2: Explore how to support and encourage more reuse and repair of products that are commonly flytipped?

**Yes / No / Do not know**

•Action 11.3: Explore a flexible approach to waste disposal with a view to trial interventions?

**Yes / No / Do not know**

**(b) Please give reason(s) for your answers.**

**24.How can we support and encourage sharing of data and joined up services and infrastructure?**

**25. Please provide examples of interventions (for example, amnesties or recycling groups) that have or have not work well.**

**26. What are the barriers to disposing of asbestos?**

For the Marine Conservation Society Beachwatch project we include a section on fly-tipped waste in our template risk assessment that is available for volunteers to tailor to their specific location. The template text also includes advice on asbestos:

*'If there is an accumulation of waste which would obviously have been fly-tipped deliberately on site, then this should be left alone and the relevant local authority with responsibility for fly-tipping clearance informed. It is possible that asbestos could be found amongst smaller accumulations of litter that may not appear to be fly-tipping. A simple asbestos ID chart can be found on the HSE website here: <http://www.hse.gov.uk/asbestos/gallery.htm>'*

<https://www.mcsuk.org/what-you-can-do/join-a-beach-clean/useful-guides-and-resources/guides-and-resources/#risk-assessment-template>

**27.(a) Do you agree with the proposed actions to:**

• **Action 12.1: Explore the role of technology in assisting private landowners and land managers deter flytipping on their land?**

**Yes / No / Do not know**

• **Action 12.2: Produce updated guidance for private landowners on dealing with flytipping?** **Yes / No / Do not know**

• **Action 12.3: Explore alternative financial support mechanisms available to private landowners and land managers?**

**Yes / No / Do not know.**

**(b) Please give reason(s) for your answer.**

**28. What support mechanisms need to be in place to help private landowners that are victims of flytipping?**

The Marine Conservation Society would recommend liaising with landowners who own land adjacent to the Crown Estate Scotland-managed intertidal area and seabed (which starts at Mean High Water Springs). Support mechanisms should be put in place to aid landowners to remove washed up, fly-tipped litter through funding from an EPR scheme, as well as helping liaise with local beach cleaning groups for access where appropriate.

**29.(a) Do you support the proposed actions to:**

• **Action 13.1: Conduct an evidence review of barriers to enforcement of flytipping offences?** **Yes / No / Do not know**

•Action 13.2: Initially raise current fixed penalties issued by local authorities, Police Scotland, Loch Lomond and Trossachs National Park for flytipping to the maximum (£500) and explore possibility of raising the maximum further at a later date?

Yes / No / Do not know

•Action 13.3: Explore the possibility and benefits of enabling local authorities and national parks to use civil penalties to enforce flytipping offences?

Yes / No / Do not know

•Action 13.4: Explore raising current fixed monetary penalties that can be issued by SEPA for flytipping offences to the maximum (£1000) and explore possibility of raising the maximum further at a later date?

Yes / No / Do not know

•Action 13.6: Review existing legislative powers for enforcing flytipping offences?

Yes / No / Do not know

**(b) Please give reason(s) for your answers.**

We would welcome the review exploring an increase to fixed penalty levels for fly-tipping similar to those for litter, as mentioned above. These penalties should be proportionate to the content and quantity found littered / fly-tipped and the need to cover the clean-up costs covered by Local Authorities (LAs). The fine amount should reflect the hazardous and environmentally persistent nature of the content, as well as size and quantity. In addition to proportionate penalty fees, a 'baseline' minimum penalty should ensure that the penalty outweighs any potential profit.

**30.(a) Do you support proposed actions to:**

•Action 14.1: Come to an agreement and develop guidance on role and responsibilities in enforcing flytipping offences?

Yes / No / Do not know

•Action 14.2: Develop guidance on enforcement best practices, including on private land and seek for this to be voluntarily adopted by statutory bodies?

Yes / No / Do not know

**(b) Please give reason(s) for your answers.**

The Marine Conservation Society supports developing guidance and agreement on roles and responsibilities in enforcing fly-tipping offences, as there needs to be a clear ownership of responsibility. The guidance needs to be transparent so the public can also hold regulatory bodies to account.

**31. Are there any additional proposals you think should be considered for the National Litter and Flytipping Strategy?**

**32.(a) Do you agree that the accompanying Impact Assessments (BRIA, EQIA, ICIA, FSDA) are an accurate representation of core issues and considerations?**

Yes / No / **Do not know**

**(b) If not, please provide detail and evidence.**

**33.(a) Do you agree with the recommendations and conclusions within the Strategic Environmental Assessment Environmental Report?**

Yes / No / **Do not know**

**(b) If not, please provide detail and evidence**