

**Mark Roberts**  
**Chief Executive**  
**Environmental Standards Scotland**  
**Ìrean Àrainneachdail na h-Alba**

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Caro Cowan  
Deputy Director  
Marine Directorate  
Scottish Government

(By email)

22 August 2025

Dear Caro,

**RE: ESS' Marine Litter analytical report recommendations**

Thank you for your letter of 30 April 2025 setting out the Scottish Government's response to recommendations made by ESS in our report '[Marine Litter: an assessment of sources, controls and progress in Scottish seas](#)'. The report found that the UK is currently not meeting its statutory target to achieve Good Environmental Status for marine litter. In Scotland, evidence indicates that prevalent sources of marine litter are from the mismanagement of waste and sewage-related debris, whilst across the EU and OSPAR area the most significant inputs to marine litter are tyre particles in road runoff, microplastics in sewage effluent and plastic pellet loss. ESS therefore also found that current monitoring does not allow for sufficient understanding of these sources in Scotland.

In our statement, ESS welcomes the constructive dialogue that has taken place with the Scottish Government since the publication of our report.

**Recommendation 1**

ESS acknowledges and supports the coordination of the Scottish Government's Marine Litter and National Litter and Flytipping Strategies in tackling land-derived sources of marine litter.

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ESS will continue to monitor the coordination and implementation of commitments made in its Marine Litter Strategy. ESS will seek an update by 26 February 2026 from the Scottish Government on progress against delivering the strategic objectives and planned actions set out in the updated Marine Litter Strategy in 2022.

## **Recommendation 2**

As set out in our statement, ESS notes the contribution of the Scottish Government in developing voluntary measures to prevent pellet loss across the entire supply chain and commitment to assessing alignment with the European Commission's proposed regulations to tackle unintentional release of plastic pellets.

However, given the prevalence of microplastics in Scottish waters and the potential for pellet loss to be one of the most significant sources of microplastics in the marine environment ESS finds it concerning that national measures to reduce pellet loss across the supply chain in Scotland remain voluntary. Furthermore, it is expected that any alignment with developing EU regulation would require a significant amount of time before they would be implemented.

ESS will therefore write to the Scottish Government once the EU legislation is finalised to clarify its plans to implement improvements through legislation. ESS also requests further information on the outcome of the critical evaluation of the EU Operation Clean Sweep Certification Scheme that was undertaken (as referenced in your letter).

## **Recommendation 3**

ESS welcomes the commitment of the Scottish Government in matching or exceeding the standards set out by the EU Directives on Single-Use Plastics and Packaging and Packaging Waste and related work on single-use food containers and other single-use items. ESS notes the Scottish Government's commitment to develop further measures to tackle consumption of problematic single-use through Scotland's Circular Economy and Waste Route Map to 2030. ESS requests that the Scottish Government provides an update on the planned next steps following its call for evidence on single-use plastic food containers in April 2024 and how it is being used to develop policies to move to a more circular approach

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of consumption. Given their prevalence in Scottish beach litter and their inclusion under the EU Directive on Single-Use Plastics, ESS also asks the Scottish Government to clarify whether it intends to include plastic wrappers and packets in their proposals for action.

#### **Recommendation 4**

ESS notes the work undertaken by the Scottish Government in developing policy options to tackle end-of-life fishing gear and welcomes the cross UK approach to progress it. However, ESS remain concerned that there is no publicly available evidence of progress.

ESS requests that the Scottish Government clarify the proposed next steps for this work, including how it aims to utilise the baseline estimates on waste throughput to assess the effectiveness any future policy in this area. ESS also requests that the Scottish Government set out how it plans to deliver this work by 2027 as outlined in the Scottish Biodiversity Strategy Delivery Plan.

ESS also requests that the Scottish Government provides an update on the uptake of the voluntary design standard and any evaluation of the effectiveness of this policy at reducing the environmental impact of fishing gear through facilitating reuse or recycling.

#### **Recommendation 5**

ESS notes the contributions the Scottish Government is making towards delivering and improving the marine litter UKMS indicators. However, the Scottish Government's response to recommendation 5 does not provide sufficient clarity on when such improvements and indicators are expected to be operational. For example, six years ago, the updated 2019 UK Marine Strategy Part One set out an operational target to develop an indicator for microplastics in marine sediment. This was still not operational in the current consultation of the UK Marine Strategy Part One update published in June 2025.

ESS therefore seeks further details from the Scottish Government on progress achieved in developing these indicators, including:

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- expected inclusion of the OSPAR microplastics in sub-tidal marine sediments and first reporting of this under the UKMS
- greater information on work trialling methodologies for monitoring plastic pellet presence on beaches
- greater information on how the Scottish Government is working with the UK Government towards the expansion of the number and distribution of OSPAR monitoring beaches and consideration of participation in the trial of the pellet monitoring methodology

ESS finds that current statutory monitoring obligations under the UKMS do not provide a comprehensive assessment of marine litter at a Scottish level. ESS is supportive of citizen science and recognises the fundamental role it plays in our understanding of marine litter in Scotland. However, to ensure the long-term resilience and effectiveness of monitoring, it should be underpinned by a statutory framework, whether delegated to public authorities or NGOs. ESS asks that the Scottish Government provide further clarification of their plans to develop an effective and resilient monitoring programme to assess marine litter.

## **Recommendation 6**

ESS welcomes the work undertaken on intentionally added microplastics. ESS requests that the Scottish Government provides an update on the outcome discussions with the UK and Welsh governments and the proposed next steps. If the Scottish Government does not have a decision/update then it would be helpful if you could indicate when it expects to have one and to commit to writing to ESS at that point.

ESS welcomes the Scottish Government's alignment with European Union environmental ambitions, and commitment to assessing the recast Urban Waste Water Treatment Directive as set out in their response to ESS' analytical report on storm overflows. ESS will continue to monitor and engage with the Scottish Government, as it develops plans to update the Urban Wastewater Treatment (Scotland) Regulations 1994.

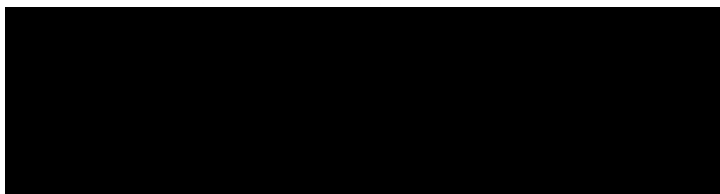
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I would be grateful if you could respond within 15 working days of the date of this letter.

Yours sincerely,



Mark Roberts

Chief Executive

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