

11 September 2025

Dear Mr Mark Roberts,

**Marine litter – an assessment of sources, controls and progress in Scottish seas**

In response to your follow-up letter of 22 August 2025, I am pleased to provide you with further details of our work in the Scottish Government to tackle marine litter.

As described previously, our Marine Litter Strategy action plan is extensive, covering a wide range of sources from microplastic to macroplastic. It reflects the multitude of significant plastic pollution sources in Scotland and the OSPAR maritime region as a whole. Our actions mirror elements of the OSPAR Regional Action Plan for marine litter which also includes mismanagement of waste, including sewage related debris as well as microplastics.

**Recommendation 1**

Earlier this year we conducted a mid-point review of our Marine Litter Strategy with the steering group, setting out the achievements to date for each individual action, and seeking further input. When finalised, this review will be published on the Scottish Government website to demonstrate the work we and our partners have conducted and the progress made in achieving the goals set out in the action plan.

In your letter you indicate an update on the strategy will be sought by February 2026. Please see Annex A for a draft of the review spreadsheet, covering all actions and progress to date. Please note this is currently not for publication, this is expected in the coming months. Overall, good progress has been made on the majority of actions, with a large number already completed or on course to be completed by the agreed timetable subject to resource availability.

**Recommendation 2**

As set out in our previous response, the Scottish Government remains committed to addressing the issue of plastic pollution from pellet loss. The critical evaluation of the Operation Clean Sweep Europe Certification Scheme in the context of supporting the delivery of the high ambitions set out in the OSPAR Recommendation 2021/06 has been undertaken by an external contractor. The draft is now being circulated for comments amongst the Contracting Parties of OSPAR. A final paper will be subject to approval by the OSPAR Environmental Impact of Human Activities Committee for publication in 2026. When the EU legislation is published later this year, a similar evaluation will be initiated through OSPAR, with an expectation of publication also in 2026. The Scottish Government will use the outcomes of these reports to inform consideration of legislative options and will share findings across the four nations.

The Scottish Government acknowledges that developing legislation requires a significant amount of time and resource, however the issue of pellet loss prevention is extremely complicated and relevant to a very diverse range of businesses from micro to multinational conglomerates. It is essential that we fully understand tools and levers that are available including the limits, barriers and opportunities of existing and impending international regulations, industry certification schemes and standards.

### **Recommendation 3**

Your letter requests an update on work on single-use plastic food containers. As stated in our previous response, the wide range of answers and evidence gathered through the call for evidence exercise will be taken into account when developing policies to move to a more circular approach to consumption in this area. Scotland's Circular Economy and Waste Route Map to 2030 commits to develop further measures to tackle consumption of problematic single-use items and promote uptake of reusable alternatives. Consideration is being given to approaches to other single use items such as plastic food containers in partnership with other nations in the UK, including the implications of the EU's Packaging and Packaging Waste Regulations

Plastic wrappers and packets are covered by the extended producer responsibility (EPR) scheme for packaging, which will move the full cost of dealing with such packaging waste from households away from local taxpayers and councils to the producers, applying the polluter pays principle. The packaging EPR will also incentivise businesses to reduce excess packaging, to design and use packaging that is easily recyclable, and encourage use of reusable and refillable packaging.

Recyclable plastic film and flexible packaging is to be collected for recycling from both households and businesses across the UK by 31 March 2027. In Scotland, we are considering the most effective approaches to implementation of our commitment to require kerbside collection of plastic film and flexible packaging. The approach to collections from households will be reflected in the statutory Code of Practice for household recycling services enabled by the Circular Economy (Scotland) Act 2024.

### **Recommendation 4**

Following on from the published research across the four nations, which provided an inventory of gear in use and coming to the end of its life annually, the Scottish Government has commissioned further work to map the recycling infrastructure in Scotland, UK and Europe relevant to the waste polymers. This work is expected to be published this year. At the time of writing we are also in the midst of a stakeholder engagement exercise with industry, visiting seven coastal venues in person to discuss and score policy options developed within the common framework process. This approach has the approval of sector membership organisations, and initial responses have been very positive, including from waste managers, local councils and harbour authorities. We will use the conclusions from these events in combination with the research results to narrow down options to trial with short-term

funding which we expect to begin in 2026, subject to resource. Efficacy of these trials will be based on the uptake and divergence of waste from landfill.

With regards to the European standard for circular design and recycling of fishing and aquaculture gear, as stated, this is voluntary. It introduces a new design concept to an industry which was entirely focused on catch/holding efficiency and longevity. As such, it is a tool that is not expected to have immediate impact, but rather long-term influence. Uptake of a voluntary standard cannot be measured, as uptake does not necessarily translate as implementation without an auditing process. What can be measured is its promotion, and through OSPAR we know that this tool is being promoted across the sectors as an introduction to a sustainable environmental concept. The standard itself was a requirement of the EU Single-Use Plastics Directive and it had been assumed that the European Commission intended to use it as a tool within wider environmental requirements. This has not been the case, and given the international nature of fishing and aquaculture gear supply chains, the approach to promotion of the standard needs to be over the wider region rather than one nation alone.

## **Recommendation 5**

Implementing the newly approved OSPAR microlitter indicator for marine sediments is challenging due to a lack of International Organisation for Standardisation (ISO), protocols and rapid technological advances in the field of microplastics. This effort involves not just OSPAR and the EU, but also ICES (the International Council for the Exploration of the Sea), particularly regarding data reporting. Although harmonised monitoring guidelines have been published, national programmes are still being developed and baseline data compiled. Current technical challenges include limit of detections (LODs) reporting and improving microlitter morphological categorisation, which would require further agreements. There are ongoing discussions about adopting a microplastic sediment indicator at the UK level.

Trialling of plastic pellet monitoring on beaches is being conducted in France, Netherlands, Portugal, Norway and Spain. They are using the harmonised monitoring guidance aiming to assess its applicability to the varied shoreline found within the OSPAR maritime area. In Scotland, we have a test of this process underway on one beach, led by a Local Coastal Partnership. We have been in discussion with the UK Government as to how we can jointly undertake a trial of sufficient scale to help inform the wider process as we move towards a candidate indicator. Such an expansion will be subject to resource availability.

Our previous response stated we were working actively with the UK Government towards the expansion of the number and distribution of OSPAR monitoring beaches. As a result we have identified four additional Scottish beaches to be considered in an expansion of the UK OSPAR beach litter monitoring programme. Final decisions will be made in 2026, subject to resourcing. These, in addition to the three existing beaches on the Firth of Forth, the Firth of Clyde, and the north east coast, would give an enhanced geographical representation.

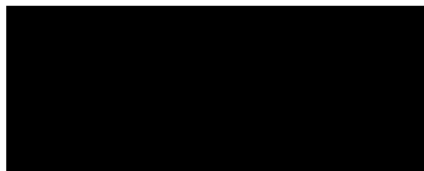
We had also outlined our monitoring programme, with ongoing monitoring strands and the development of a methodology for a new area of investigation. We greatly value the ongoing work of NGOs in this field, and the long-term data they provide and that we are able to use as evidence to support the development of marine litter policy. The statutory framework for our monitoring remains underpinned by the Marine Strategy Regulations 2010, there are no plans for delegation of marine litter monitoring duties to public authorities or NGOs.

## **Recommendation 6**

Further to the information previously provided on intentionally added microplastics, the Scottish Government identified this as a priority issue for consideration under the UK REACH restriction process in 2021. While preparation of a restriction proposal under UK REACH wasn't taken forward at that time, we agreed with UK Government and Welsh Government that an evidence project would be undertaken, led by Defra, on the risks and possible mitigation measures for the use of intentionally added microplastics in Great Britain. Following the publication of the report earlier this year, we are still in discussions with UK Government and Welsh Government on possible next steps.

I hope you found this information helpful.

Yours sincerely,



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