

## Marine Strategy Part One: UK Updated assessment and Good Environmental Status 2025

August 2025

1.a)	<b>To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of the state of UK seas. What else, if anything, would be valid to include?</b>
	<p>Scottish Water has no specific comment to make on whether the information is an accurate reflection of the state of UK seas. We note that Descriptor 10 – Marine Litter, has not achieved GES in 2024 and it remains high, although there are encouraging reductions in some areas.</p> <p>Scottish Water’s previous responses to the UK Marine Strategy Assessments in 2012 and 2019 concentrated on Marine Litter descriptor (D10), and this will remain the main area of our response for this consultation.</p> <p>Our scope of influence in relation to marine litter, is generally limited to Sewage Related Debris (SRD) due to the nature of our operations. In relation to achieving GES in the marine environment, Scottish Water would like to highlight the significant historic and ongoing contributions we have made through our regulatory investment programmes. These investments in the treatment of coastal and marine discharges have led to improvements in environmental quality and a reduction in marine litter.</p> <p>Marine litter results from both land-based and direct inputs into the marine environment. Although there is reference to “<i>encouraging reductions in beach litter</i>” within this assessment of GES, Scottish Water would like to highlight that there is opportunity to further reduce the land-based inputs to marine litter through stronger controls on the inappropriate disposal of items to sewer. The inappropriate disposal of items to the sewer can cause sewer blockages and subsequent overflows into the environment. Scottish Water currently deals with 36,000 sewer blockages per year, at a cost of around £7 million annually. Our Nature Calls campaign aims to reduce sewer blockages and protect the environment by encouraging people to ‘Only Flush The 3Ps: Pee, Poo and toilet Paper’ and to ‘Bin the Wipe’. However, Scottish Water recognises that customer awareness campaigns alone will not solve the issue of inappropriate disposal to sewer.</p> <p>Scottish Water believes there is scope for further policy and legislation to tackle inappropriate disposal to sewer, which in turn would have the benefit of reducing land-based inputs of marine litter. Effective policy and legislation are a key means to achieve this. Consumers must be able to make informed choices when purchasing products, such as wet wipes and other items, likely to be flushed down the toilet when being disposed of. For example, clear and consistent labelling, such as ‘do not flush’ and ‘dispose in bin’ would be useful to avoid consumer confusion.</p>

A focus on source control for litter, including plastics, could prevent items from entering the water or wastewater system and subsequently being released into the environment. Although the UK continues to meet many standards set out in the EU single-use Plastics Directive, further initiatives to control single use plastics are vital to support the marine litter objectives set out in the UK Marine Strategy framework.

Scottish Water would also welcome further actions and controls on problematic plastic items, that are rarely recycled, where alternative materials are available. For example: plastic tampon applicators, cigarette butts, plastic backing strips (on sanitary and incontinence pads) and plastic wrapping. We would highlight that these plastics are often used unnecessarily and can contribute to sources of marine litter.

Scottish Water recognises the importance of engaging customers and changing behaviour, alongside influencing policy and legislation for effective source control. There are also significant opportunities for co-ordinated actions across the UK's devolved nations to address the control of items disposed into the environment. Scottish Water would welcome a much stronger focus on these aspects within the Marine Strategy to reduce the UK's overall marine litter input and help meet GES for this descriptor.

<b>1.b)</b>	<b>To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of progress toward Good Environmental Status. What else, if anything, would be valid to include?</b>
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Scottish Water has no comment to make.

<b>2.</b>	<b>Do you agree with the revised overarching targets (also known as characteristics) we have set for GES. If not, what would you change?</b>
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Scottish Water has no comment to make.

<b>3.a)</b>	<b>To what extent are the proposed criteria to be used in the next assessment cycle sufficient to guide progress towards achievement of GES? We would like your feedback on both those that have changed, and those that remain the same.</b>
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Scottish Water has no comment to make.

<b>3.b)</b>	<b>To what extent are the proposed targets to be used in the next assessment cycle sufficient to guide progress towards achievement of GES? We would like your feedback on both those that have changed, and those that remain the same.</b>
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In general, Scottish Water welcomes the steps and measures set out, but in keeping with our views above, would suggest that for D10 (Marine Litter), further source control references could be made. This should reflect the EU Single use Plastics Directive, along with domestic legislation to limit releases to the environment.

<b>3.c)</b>	<b>To what extent are the proposed indicators to be used in the next assessment cycle sufficient to guide progress towards achievement of</b>
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	<b>GES? We would like your feedback on both those that have changed, and those that remain the same.</b>
	<p>Scottish Water is aware that there is a lack of statutory monitoring of microplastics in the marine environment in Scotland. As this UK Marine Strategy Assessment states that work is underway to develop an indicator for microplastics in seafloor sediment, we would welcome this addition in the next assessment cycle to guide progress towards GES for D10 (Marine Litter).</p>
<b>4.a)</b>	<b>Do you feel that there are any policy gaps? If so, please identify the gaps and explain how these could be filled?</b>
	<p>Scottish Water would suggest that clearer references to National Litter Strategies are made. Currently, within the UK Marine Strategy Part 3: 2025 Programme of Measures, there is no mention of Scotland's National Litter and Fly Tipping Strategy.</p> <p>There should be consideration of the alignment between litter strategies in the UK, and their contributions to targets within the UK Marine Strategy, particularly for Marine Litter, where appropriate.</p>
<b>4.b)</b>	<b>Do you feel that there are any evidence gaps? If so, please identify the gaps and explain how these could be filled?</b>
	<p>Scottish Water undertakes significant efforts to remove litter that enters our wastewater systems. The primary approach involves mechanical screening at Wastewater Treatment Works (WwTW) and Combined Sewer Overflows (CSO). Coarse and fine screens effectively capture solid materials such as wet wipes, sanitary products, and other debris. Regular clearance and maintenance of these assets is necessary. In 2024, we removed a total of 6,568.68 tonnes of grit and screened material from our WwTW.</p> <p>The water industry is currently considering methods to standardise the collection of data relating to litter, plastic and debris removed from public sewers and WwTW. Scottish Water welcomes the opportunity to input into this.</p>

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