# **Guidance for Completing the Management of Plastics by Aquaculture Leaseholders Report**

## **Background**

Following the 2022 Aquaculture Review, Crown Estate Scotland (‘CES’) is introducing terms to monitor its aquaculture leaseholders’ performance as responsible tenants of a shared public marine environment, through an annual reporting obligation in the seabed lease. This requires submission of reports on one or more co-existence and/or stewardship topics specified in the Schedule to the Lease that reflect current issues and priorities for management of this nature.

One of these requirements is for all tenants of aquaculture leases to report annually on the management of plastic equipment and equipment containing plastic (‘marine plastics’) used on the leased subjects (“management of plastics”).

## **Rationale**

This is not intended as a policing exercise. CES is not asking tenants to report on what plastic materials are being used nor how much.

Rather it is a measure to have tenants report annually on representational changes in the procurement and different means of disposal of plastic products, simply aggregated across all materials and leased sites upon which they are used.

Additional context to the reported changes as well as information on further measures on tenant’s policies and practices to prevent the release of plastics into the marine environment can also be included.

This reporting serves to confirm on-going maintenance of necessary records by tenants as part of their operational management of leased seabed, that enable their own oversight and analysis of what and how much plastic is being used and what manner of disposal is available for plastic waste and redundant plastic material.

It is increasingly important that all users of the marine environment, and especially those doing so for commercial purpose, are seen to recognise and act upon their responsibility for preventing the release of plastic materials into our seas.

In granting seabed rights, CES recognises its own duty of care and the need to have measures in place to secure necessary assurance of this obligation through the terms of those rights.

## **General information regarding reporting requirements**

* Tenants are required to deliver to CES on or before the 31st day of January in each year of the Lease, a report confirming year on year changes (increases/decreases) in aggregated procurements of marine plastics and the means of disposal for plastic waste/redundant materials.
* A brief context to the reported changes and other relevant information on measures to prevent plastic pollution from leased sites should also be provided. It is recommended that this is done by means of a completed **Management of Plastics: Aquaculture Leaseholder Report**. The report can be downloaded from [this page](https://www.crownestatescotland.com/scotlands-property/aquaculture/annual-sustainability-reporting) (Note: An alternative reporting document may be used by tenants but must include the same information to be considered acceptable). For the purposes of this guidance, it will be assumed that the Report template referred to (Management of Plastics: Aquaculture Leaseholders Report) will be used.
* Records must be maintained by the tenant and reports submitted on these annual changes for both multi-use and short term/single use plastics that are either in use on site or held ashore pending anticipated use on site(s).
* Reporting is not required for other plastics used by the business that are not used on sea sites although management of these plastics, to avoid their loss, should be exercised as good practice.
* Procurements and waste disposal sections of the reporting template must be completed, and available context and additional information provided where this gives clear confirmation of operational policies, practices, and any issues.
* Refer to Table 1 in “[Guidance for completing the recording spreadsheet for plastic on leased aquaculture sites (‘inventory’)](https://www.crownestatescotland.com/resources/documents/aquaculture-guidance-on-using-management-of-plastics-inventory-tool)” for examples of Multi-use and Short term/Single Use Plastics.

## **Tenants of multiple leases**

* Reports can be aggregated for a tenant’s entire farming activities, i.e., a single report for all plastics used across all leases or if a tenant wishes, a separate report can be submitted for each lease or an operational cluster of leases.
* CES will not require a tenant’s marine plastics inventory and other related management records to be submitted.
* CES or their contracted representatives may ask to see the records or inventory if visiting the tenant’s premises for any reason, to confirm its support of reported changes.

# **Recording Spreadsheet for Plastic on Leased Aquaculture Sites (‘inventory’)**

A Recording Spreadsheet for Plastic on Leased Aquaculture Sites (‘Inventory’), suitable for recording tenants’ management of plastics has been provided by CES and is designed to help gather data for site/company to assist with reporting. The recording spreadsheet for plastics on leased aquaculture sites (‘inventory’) is [downloadable here](https://www.crownestatescotland.com/resources/documents/management-of-plastics-aquaculture-inventory-tool) with [instructions for use available here](https://www.crownestatescotland.com/resources/documents/aquaculture-guidance-on-using-management-of-plastics-inventory-tool).

**It is not compulsory to use this format and tenants may already have their own data records which they prefer to use. Where Tenants use their own record formats, they must ensure that these are sufficient to fulfil their reporting obligations.**

* The CES Plastics Inventory Template is designed to be adaptable to each company farming system configuration. There are worksheets for short term/single use plastic, multi-use plastic and a worksheet to assist the collection and collation of multi-use plastic across all leases held. Additionally, there is a worksheet to collect information on the management of plastic as waste.
* The CES Plastics Inventory Template or your own plastics management records will **not** be requested as part of the annual submission to CES but the information it contains is required for each annual report.
* However, as indicated, CES representatives may ask to see these records or evidence of your own records during site visits.
* Once an inventory is established, it is envisaged that most data will be transferable from year to year – with annual recording of procurements or disposals required for the current year updated.
* This data can then be used to inform the sections within the **Management of Plastics: Aquaculture Leaseholder Report** to be submitted.

Please refer to the separate guidance documents.

# **Guidance for completion of ‘Management of Plastics: Aquaculture Leaseholders Report’.**

* **The Management of Plastics: Aquaculture Leaseholder Report must be sent to CES annually by January 31st.**
* Please refer to ***‘Management of Plastics: Aquaculture Leaseholders Report Template’***
* **All or parts of the information provided in this document may be published by CES.**
* The document provides for CES tenants to confirm that they maintain appropriate records, including for procurements and post use disposal methods, that enable oversight and analysis of the use of marine plastic on leased seabed and associated management practices which help to ensure plastic is not lost in the environment.
* Additional comments/notes can be included where necessary to provide context and explain in further detail any mitigating circumstances, or specific points of note (refer to Table 1 below for guidance).
* These could include details on new management strategies adopted, change in processes and other reasons that result in reported changes in plastic procurements and/or disposals, e.g., expanding a site, significant storm damage causing replacement, bulk purchases for cost saving etc.

### **How to complete the Management of Plastics: Aquaculture Leaseholder Report**

This report template is used to provide the required information on the management of plastics in the previous year (Jan-Dec) to CES on an annual basis. The tenant should be able to collate and obtain the necessary information for their annual report from their recording spreadsheet or their own company specific recording system for plastic use.

**Table 1: Guidance for completing the Management of Plastics: Aquaculture Leaseholder Report**

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|  | **Explanation** |
| **Management of plastics– reporting information** | The tenant is to complete details regarding their company including name, address and leases held. |
| **Confirmation that records of plastic management have been maintained** | This provides a statement that in signing and dating this document, the tenant verifies that they have maintained appropriate records of marine plastic for their leased sites for the reporting year that support reported changes in procurements and disposal means. |
| **1. Management of plastic in this reporting period** |  |
| Plastic procurement in this reporting period (i) & (ii). | The tenant should confirm whether procurement of plastics has increased, decreased or stayed the same in the reporting period compared to the previous year by deleting the unapplicable options. There are separate confirmations for (i) multi-use and (ii) short term/single use plastics, and where there has been an increase or a decrease, reasons for reported changes can be provided – see below for examples.  The comparison is based on the aggregated difference for each category (multi-use and short term/single use) from the current and previous year.  In the first year this section can be left blank or (preferably) an estimate can be provided based on an estimated previous year procurement and the current reported years’ records. |
| (iii) Plastic disposal methods in this reporting period.  Reasons for change in disposal methods | The tenant should complete the table by placing an **√** in the appropriate boxes in Table 1.  Where there has been an increase or a decrease in the use of a disposal method provide reasons – see below for examples.  In the first year this section can be left blank or (preferably) estimates can be provided based on an estimated previous year waste disposal method and the current reported years’ records.  This section is to encourage tenants to provide context to changes in the disposal methods used. For example, use of a new service provider offering recycling of plastics that were previously sent for landfill or incineration, new technologies in material separation and recovery are established or if there are no options for improving the recycling of plastics in your region. |
| **2. Improvements in management of plastics on leased sea-sites** | This section is for the tenant to provide additional information on waste management strategies they currently have in place, any codes of conduct/certification schemes they are part of, and other programmes, schemes or associations they subscribe to that support the responsible use of plastic, circularity and waste reduction.  They should include improvements achieved in the reporting period – see below for examples.  In the first year of reporting, this section should include the current management practices in place – see below for examples. |
| **3. Opportunities and challenges** | The tenant should comment on any opportunities, challenges and mitigating circumstances relevant to the management of plastic used on leased sea-sites during the reporting period – see below for examples. |
| **4. Any other relevant information** | The tenant should comment on any other factors they wish CES to be aware of regarding plastic use or waste management on their leased sites– see below for examples. |

### **Guidance and information relevant to, and examples for, completing sections include:**

### **Management of plastic in this reporting period**

### Multi-use plastic procurement in this reporting period

Reasons for increase or decrease could include, for example:

* Increase in company production through additional sites/modifications to existing ones.
* Items replaced due to end of life.
* Items no longer required.
* Items damaged or lost due to storms and requiring replacement.

### (ii) Short term/Single use plastic procurement in this reporting period

Reasons for increase or decrease could include for example:

* Increase in company production through additional sites/modifications to existing ones.
* Items no longer required or changed to a non-plastic material alternative.
* Items damaged or lost due to storms and requiring replacement.
* Change to a new supplier
* Procurement of bulk purchases for cost savings

### Waste plastic disposal methods in this reporting period

Reasons for increase or decrease of certain waste disposal method could include for example:

* Changed to a new contractor
* Move to use of a product which can/ cannot be recycled/repurposed/composted.
* New option available for recycling.
* Use of item that has no recycling options available locally.
* Sold/passed on for alternative use to third party (e.g. the community, private sector business, another farm).

### **Improvements in management of plastics on leased sea-sites**

This could include, for example:

* Current practices and projects in place to reduce plastic waste, increase recycling and avoiding unnecessary plastics.
* Use of reusable and long-life plastics where possible.
* Sourcing of items that allow greater recycling of plastics at end fate.
* Sourcing of items that contain recycled plastic (provide details where available).
* Sourcing of new and novel technologies e.g., bioplastics, compostable plastics (provide details where available) that reduce the reliance on fossil-based virgin plastic.
* Current practices in place to ensure growing systems are adequately moored and maintained to avoid gear loss and to reduce risk of loss.
* Any other additional measures to reduce purchase of plastic items and or reduce the risk of plastic leakage for the company.
* Waste segregation strategies on your site(s).

#### Best practice management in place including:

* Company Procedures and Policies used on leased sea-sites, (e.g. plastics management policy or other environmental or waste management policies that address use and management of plastics – including documented procedures for procurement; targets and objectives that may address reduction, reuse and recycling; prevention of loss to the environment; recovery of plastic equipment and gear that has detached or required repair (please include all that are relevant).
* Industry Codes of Conduct/Standards/Guidelines that specify best practice for waste management and/or including plastic waste management e.g. ASSG Code of Practice; Code of Good Practice for Scottish Finfish Aquaculture; other verification/certification schemes.
* Contractor information for waste collection and disposal - identification waste disposal information and provision of reports on end fate of waste, recycling rate including the recycling of plastic.
* Signage and other information provided within the business to raise awareness within company of good waste management practices.
* Staff training in plastic and waste management.
* Review and updates to plastic waste and management strategies as part of continuous improvement.
* Member of organisations that provide information, raise awareness, provide advice, education and advocacy in circular economy, zero waste and responsible plastic management practices.

If new strategies or improvements have not been introduced, tenants can insert comments regarding the effectiveness of current strategies and management practices during the reporting period.

### **3. Opportunities and challenges**

Please provide any additional information you feel is relevant to the management of plastics on your lease areas or potential actions that would support the improvement of plastic management.

This could include, for example:

* Some materials don’t have alternatives available in a recyclable format.
* Purchasing constraints due to company size/location.
* Limited access to recycling facilities available in our region and cost to transfer to a facility are prohibitive.
* Limited influence on the supply and waste stream to affect the fate of waste.
* A central location would be of benefit for bulking and sorting plastics for collection by recyclers.

### **Any other relevant information**

This could include, for example:

* Any other additional measures to reduce plastic losses to the marine environment in operational activities on leased seabed areas.
* Involvement in any community-based initiatives for collection of plastic litter.
* List any measures (e.g. internal and external training or events attended by staff) to raise awareness on plastic and the company’s management strategies.

# **Instructions for submitting completed reports.**

Leaseholders can submit their reports on or before the 31st January of each year. Reports should be e-mailed to [aquareporting@crownestatescotland.com](mailto:aquareporting@crownestatescotland.com) or sent to the address below marked for the aquaculture team. Please title the e-mail as the Annual Plastic Report (year) for (your company name).

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