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WWF Response to the European Commission's Consultation “Reducing marine litter: actions on single use plastics and fishing gear”

INTRODUCTION

Plastics are an important material in our economy, and modern daily life is unthinkable without them. At the same time however, they can have serious downsides on the environment and health, as they have relatively low rates of reuse and recycling and are prone to littering. Plastics make up 85% of beach litter; single use items represent 61% and fishing related items 20% of these plastic items. Such pollution is endangering our waters and directly affecting the life of millions of people who directly depend on coastal and marine resources. A total of 8 million metric tonnes of plastics leak into the ocean each year, a figure which could easily double in 10 years.

We need to act now. Concrete actions such as bottle deposit schemes are a good place to start, but we are so reliant on plastics that we need to do a lot more to wean ourselves off them. A plan to ban single use plastics – such as plastics cups and cutlery – could make the real difference we need to protect the planet and our marine environment. This brings to light the immediate need for regional and collective action among governments and industries, and to create more awareness among consumers on how small changes such as saying “no” to single-use plastics can make a big difference in our marine environment.

The European Union has decided to launch a “[European Strategy for Plastics in a Circular Economy](#)” with ambitious proposals to phase out single-use plastics. The objective of the below European Commission's consultation is to provide input, opinions and data for preparation of the follow-up Plastics Strategy in relation to marine litter, particularly from single use plastics and fishing gear. Follow-up proposals by the Commission will be considered in the near future on the basis of available data and analysis provided in the sections below.

- Section A contains WWF positions on the issue of Marine Litter and Single Use Plastics.
- Section B is focused on abandoned and lost fishing gear, questions which require some more specialised knowledge.

WWF has over 20 offices across Europe and this questionnaire has been submitted after a broad consultation with its network. Questions that are asking for a personal comment have therefore not been included in the below questionnaire.

WWF hopes that the responses to the public consultation inspire public authorities to make the crucial changes needed to protect and conserve our valuable coastal and marine environment.

A. MARINE LITTER AND SINGLE USE PLASTICS

THE PROBLEMS CAUSED BY MARINE LITTER AND SINGLE-USE PLASTICS

1. What importance do you give to the following issues and impacts linked to marine litter and single use plastics?

	Very important	Quite important	Less important	Not important
Loss of valuable resources through wasteful use and disposal	X			
Harm to animal welfare (ingestion, entanglement etc)	X			
Human health risks (microplastics in water and food, toxicity)	X			
Impact on ecosystem services (For example flood protection, provision of food, materials and energy, recreational, cultural and touristic use, science and education)	X			
Impacts on fisheries and aquaculture	X			
Impacts on shipping and ports		X		
Impacts on coastal communities and tourism	X			
Clean up costs of litter		X		
Aesthetic impact of litter		X		

Other (please specify):

- Material (especially micro-plastics) is difficult to recover.
- Ubiquitous distribution of a man-made material, which is not biodegradable, in several ecosystem compartments.
- Lack of financial and market incentives for recycling (it is more economically viable to produce new products). Particularly for small island states whereby the cost of transporting waste for recycling and the lack of markets for recycled material impacts on the incentive to collect and sort materials for recycling.
- A lack of standards in relation to the use of ocean plastics (marine litter) in new (fashion) products

THE IMPORTANCE OF ACTION

2.a. Please indicate whether you think action to address the amount of Single Use Plastic in the environment is:

- **Necessary and urgent**

The issue of marine litter and single-use plastic is connected to waste prevention and waste management, has been an emerging environmental issue for decades which is now reaching crisis point. Unfortunately, waste prevention and measures towards developing a circular economy have not delivered the results required. This means that a substantial proportion of waste is landfilled or incinerated and not recycled. Several recommendations, e.g. establishing a common approach on extended producer responsibility for all EU countries and support the recyclability of packaging, are on the table. Therefore, a tight timeframe for target setting is needed for implementation of national regulation which will address these issues. In some regions, demand for recycled plastic is so low that virgin plastic from non-renewable resources is considerably cheaper. **A market based solution towards the circular economy is only achievable if governments regulate the extended producer responsibility multilaterally.**

2.b. Please indicate whether you think action to address the amount of marine litter (including fishing gear) in the seas and on beaches is:

- **Necessary and urgent**

Many studies prepared by different institutions are showing the scale of the problem, be it littered beaches or micro-plastics found in many fish and shellfish species. The recruitment of whole populations of seabirds can be jeopardised by adults mistaking plastic for food resulting in chick starvation and death. Besides cleaning activities, a reduction of input of marine litter has to be addressed.

Before sinking or disappearing, plastics can be carried on thousands of kilometers, on the surface or at depth. Microorganisms such as bacteria with some species belonging to pathogenic families can be fixed on plastics. These fixations could promote the dispersal of pathogenic species which is problematic to a closed sea such as the Mediterranean.

WHERE ACTION SHOULD BE TAKEN

3. Who do you think has an important role in taking any further action for reducing leakage of single use plastic into the (marine) environment?

	Very important	Fairly important	Important	Slightly important	Not at all important	No opinion
European Union	X					
Member States	X					
Local and Regional authorities	X					
Other international bodies	X					
NGOs	X					
Individuals		X				
Private Sector	X					
Other	X					

If "other", please specify:

Marine litter is especially a problem of developing countries and mostly connected to mismanagement of waste on land. EU activities should also include measures to support activities in third countries to reduce the share of mismanaged waste.

Despite the above, it should be noted that plastic consumption is four times higher in Europe than in the rest of the world. Introducing regulatory measures to ensure that the price of goods actually reflect the costs of production is essential to reduce this overconsumption.

The private sector, especially companies which are introducing packaging or packaged products into the markets, should be responsible for collection, sorting and recycling of the packaging waste. The private sector should also be encouraged to increase the recyclability of packaging and to increase, where possible, the use of recycled material. Besides the end of life cycle, regulation should encourage better product and packaging design produced from renewable resources / biomass, with the key objective of an improved shelf life.

The role of local authorities is important considering their competence in managing waste collection. If this is not done effectively, the waste ends up in the ocean. Consumer behaviour may also play an important role, but it needs a sufficient regulatory framework and implementation of effective waste management to give consumers an opportunity for “better behaviour” regarding sorting of waste and prevention of littering.

4. To what extent do you consider that there needs to be further responses at European level?

- There should be certain measures at the European level - for example ensuring shared objectives, a level playing field and respect of single market and competition rules – but these should also encourage, frame and complement further measures at the local or national level.

If "other", please specify

- The EU should harmonize the different approaches on extended producer responsibility. At the moment the implementation of Extended Producer Responsibility (EPR) differs from one Member State to another.
- Support of waste management improvements in developing countries should not be given on a case-by-case basis. Instead, an overarching concept which includes instrument to improve waste management and to reduce marine litter should be lined out so that funding of projects are aligned with these concepts. E.g. the projects may focus on specific regions where a massive input of marine litter is probable (e.g. along rivers in SE-Asia).

HOW MUCH ACTION?

5. The Commission identified the types of plastic litter most commonly found on beaches. For each type, and for fishing gear, to what extent do you agree that action should be taken to reduce their presence in the environment?

	Weak case for action	Moderate case for action	Strong case for action	No opinion
Cigarette butts with filters			X	
Drinks bottles			X	
Caps and lids			X	
Cotton bud sticks			X	
Sanitary towels (nappies, wet wipes and panty-liners typically contain about 90% plastic polymers).			X	
Crisps packets and sweets wrappers			X	
Light weight shopping bags			X	
Straws			X	
Balloons and balloon sticks			X	
Food containers			X	
Cups			X	
Cutlery			X	

Fishing related items			X	
Other			X	

If "other", please specify

- Micro-plastics

7. In your opinion, which types of actions against marine litter should be supported with public funds?

- Recovery of lost fishing gear.
 - Recovery of marine litter found in fishing nets during normal fishing activities ("passive fishing for litter")
 - Active "fishing for litter"
 - Beach cleaning actions
 - Regular quantification of marine and beach litter
 - Other:
- Improvement of waste management systems, especially in EU countries with a reasonable share of mismanaged waste, as well as in the waste management systems of third countries with special focus on Turkey and North Africa, as the vast amount of plastics entering the Mediterranean Sea comes from these areas.
 - Funds for improvement of waste management systems in developing countries
 - Support and development of port reception facilities for ship and fishing waste
 - Research for retrieval of lost fishing gear, support for fisheries for retrieval of fishing gear, databases or maps to inform fishing communities of marine structures and habitats which may lead to lost gear

WHAT KIND OF ACTION (AT SUB EU LEVEL)

10. What, if anything, do you think should be done to promote a switch from single use drinks cups to re-usable cups for drinks consumed "on-the-go" (outside of the home or restaurants and food outlets)?

- Direct measures (such as restrictions or charges)

Measures should be implemented in an adequate combination.

11. Would you support policies which phased out disposable non-biodegradable plastic tableware (such as cups, plates, cutlery and stirrers) in favour of those made with more biodegradable materials or reusable alternatives?

- No opinion

This question is asking for a personal comment. It is however worth it to highlight that "reusable alternatives" are not comparable to biodegradable, as in most cases reusable materials do have a lower ecological footprint compared to biodegradable or non-biodegradable single-used plastic material. It is also questionable whether biodegradable has really an advantage to non-biodegradable material if degradation in the marine environment is considered.

12. For some sectors there are rules that require companies responsible for the impacts of their products after sale ("extended producer responsibility"). Should cigarette companies contribute financially to the costs of clearing up cigarette butts?

- Yes

Similarly, should producers of sanitary items contribute financially to the costs of clearing up sanitary towels?

- Yes

Not only the sanitary producers should be responsible for their products. Every company should take a responsibility for the end-of-life of their products. This encompasses e.g. the financing of waste collection, sorting and recycling and the design of a product for recyclability or (where appropriate, e.g. for personal care products) for biodegradability.

WHAT KIND OF ACTION (AT EU LEVEL)

13. How effective do you think the following measures would be in reducing plastic pollution in particular in the marine environment?

	Very effective	Effective	Slightly effective	Not effective	I don't know
Maintaining status quo:				X	
No new EU measures				X	
More effort to change the behaviours that cause litter, for example awareness campaigns about littering and additional information on packaging			X		
Voluntary measures by businesses: such as using biodegradable alternatives to plastic		X			
Stronger enforcement of existing EU laws on waste collection, recycling, extended producer responsibility schemes etc,	X				
New EU measures: For example, reduction targets for Single Use Plastics (following the example of the targets for reduced use of plastic bags)	X				

14. Single use plastic products are diverse and will require diverse approaches to effectively reduce their environmental impacts. We have divided them below into three categories. For each product please indicate the approach(es) you consider as appropriate (effective, proportionate, economically efficient and socially acceptable).

A. Packaging items covered by existing legislation and already captured today in separate waste collection schemes

	Deposit return schemes	Reduction target for use	Minimum design requirements (inc. delivery models)	Don't know /no opinion
Drinks bottles	X	X	X	
Light weight shopping bags		X	X	

B. Items that could be replaced by more sustainable alternatives

	Deposit return schemes	Reduction target for use	Minimum design requirements (inc. delivery models)	Don't know /no opinion
Food containers		X	X	

Crisps packets and sweets wrappers		X	X	
Caps and lids		X	X	
Cups		X	X	
Cotton buds		X	X	
Cutlery		X	X	
Straws and stirrers		X	X	

C. Items not fully covered by existing legislation for which there is no obvious proportionate alternative

	Deposit return schemes	Reduction target for use	Minimum design requirements (inc. delivery models)	Don't know /no opinion
Cigarette butts			X	
Sanitary towels			X	
Balloons			X	

B. MARINE LITTER AND FISHING GEAR

1. Which seas do you base your answers on (more than one answer allowed)

- Adriatic Sea
- Bay of Biscay and the Iberian Coast
- Caribbean Sea
- North Sea
- Pacific
- Arctic
- Western Mediterranean
- Atlantic Ocean
- Indian Ocean
- Baltic Sea
- Ionian and the Central Mediterranean

IMPORTANCE OF THE PROBLEM

2. Please indicate whether you think action to address the amount of fishing gear in the seas and on beaches is:

- Urgent

3. Who do you think has an important role in taking any further action for reducing leakage of fishing gear into the (marine) environment?

	Very important	Fairly important	Important	Slightly important	Not at all important	No opinion
European Union	X					
Member States	X					
Local and Regional authorities		X				
Other international bodies	X					
NGOs		X				
Fishers	X					
Fisheries Organisations	X					
Private Sector		X				

4. How much gear is lost or discarded per year?

A. From your experience, how much fishing gear is lost at sea per year? (percentage on a vessel of that gear)

	None	Hardly any	Some	Most	All	Don't know
Gill nets			X			
Trawl nets			X			

Seine nets		X				
Lines and cords			X			
Lobster/crab pots			X			
Other						

B. From your experience, how much fishing gear is discarded at sea per year? (per vessel)

	None	Hardly any	Some	Most	All	Don't know
Gill nets			X			
Trawl nets			X			
Seine nets		X				
Lines and cords			X			
Lobster/crab pots		X				
Other						

If you have more precise numbers for lost gear please provide them here

More information and the assessment of the amounts and reasons for gear lost is available on the official website of MareLitt Baltic project:

<https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5a27b5c1652dea2700afb72c/1512551880578/Reasons+for+gear+loss+changes+in+fisheries.pdf>

C. From your experience, what is the average replacement rate of such gear per year? (per vessel)

	None	Hardly any	Some	Most	All	Don't know
Gill nets				X		
Trawl nets				X		
Seine nets						X
Lines and cords				X		
Lobster/crab pots						X
Other						

D. From your experience, how important is the contribution to marine litter of the following types of aquaculture?

	Very important	Important	Slightly important	Not at all important	Don't know
Marine cages					X
Lagoons / Valliculture					X
Off- bottom shellfish (rafts, longlines)					X
On - bottom shellfish (inter-tidal)					X
Other					

On what information do you base your answers above?

- Items found in fishing nets
- items brought ashore from fishing boats
- Video surveys
- Trawl surveys
- Scientific publications
- Other

If "other", please specify

The answers are based on experiences that WWF has had in ghost nets search and retrieval projects since 2011. Also, within MARELITT Baltic project Simrishamn municipality in Sweden, WWF and Keep the Estionian Sea Tidy in 2016 have lead the surveys among Baltic fishers asking about the amounts and reasons for gear loss in the Baltic, more information is available here:

<https://www.marelittbaltic.eu/calender/conference> and
<https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5a27b5c1652dea2700afb72c/1512551880578/Reasons+for+gear+loss+changes+in+fisheries.pdf>

5. In your opinion, which measures would help reducing lost or discarded gear?

- Incentives to bring fished up litter and end-of-life gear ashore
- Incentives/Funding of retrieval action
- Better collection and sorting facilities on vessels and at ports
- Better marking/identification
- Better enforcement of existing rules
- A map of hotspots and snagging site
- Other

If "other", please specify:

Important measures would also be better waste management systems particularly including port facilities. At present, fishers in some Baltic countries needs to cover the cost of reception, transport and utilisation of old nets by the waste management companies.

REPORTING LOST GEAR

6. What proportion of lost gear is reported?

- Hardly any

The (missing) option “none” would be most appropriate.

RETRIEVING LOST GEAR

7. From your experience what proportion of gear lost at sea is retrieved?

- Hardly any

8. Which measures would make gear retrieval more successful?

- Incentives to bring fished up litter and end-of-life gear ashore
- Better collection and sorting facilities on vessels and at ports
- Better marking/identification
- Better retrieval equipment
- Better enforcement of existing rules
- Better knowledge of hotspots and snagging sites
- Better knowledge of effective retrieval methods
- Other

If "other", please specify

The most important measure is to strengthen cooperation with fishers and their good will in sharing the knowledge about lost gear locations. Fishers often know where the lost nets are located, and it would be therefore essential to incentivise this share of knowledge, mainly the coordinates of underwater obstacles.

Some other measures include:

- The creation of a protocol for the geolocalized census on fishing gear lost, abandoned or discarded (ALDFG) at sea and their different impacts in order to collect homogeneous data.
- The creation of an online form of participatory science to collect georeferenced observations from different users (marine parks, national parks, scuba divers, federations) of the marine environment.

9. In your opinion, which types of actions against marine litter should be supported with public funds?

- Recovery of lost fishing gear (after prior identification of hot spots)
- Recovery of marine litter using fishing nets ("active fishing for litter")
- Regular surveys for quantification of lost fishing gear
- Databases on concentrations of abandoned, lost or otherwise discarded fishing gear (ALDFG), to facilitate later recovery
- Recovery of fishing gear and marine litter washed up on beaches
- Other

If "other", please specify

Important measures would also include better waste management systems particularly including port facilities. At present, fishers in some Baltic countries needs to cover the cost of reception, transport and utilisation of old nets by the waste management companies.

Innovation can play an important role to develop and implement electronic marking systems for fishing nets. These innovation projects should be established in collaboration with fishers, scientists, innovation SMEs, NGOs and other stakeholders, local, regional and EU authorities. The EU research and innovation funding in addition to the future EMFF budget could contribute to pilot projects to be tested, monitored, evaluated and scaled if successful.

LOST GEAR BROUGHT ASHORE AND END-OF LIFE GEAR

10. The proposal for a revised Port Reception Facilities (PRF) Directive foresees the introduction of a 100% indirect fee for waste from fishing vessels (including "passively" fished waste) and the separate collection and handling of this waste in ports. What additional targeted measures are needed to support the management of gear brought ashore and/or end of life gear?

- Extended producer responsibility scheme including levy on gear
- Deposit return schemes: levy on fishers
- Public funds
- Other

If "other", please specify

Also, electronic marking system for fishing nets in order to identify its owner, as well as deposit return schemes.

11. Is there any sorting of waste at the port (in line with EU waste legislation, and as envisaged in the Port Reception Facilities proposal)?

- No

12. What proportion of discarded or end of life gear is recycled in your country or sea area? And, according to your opinion, what proportion could be recycled?

The below answer are based on the situation in Poland, where WWF has most expertise on end of life gear.

	Over 50%	25%-50%	Less than 25%	None	Don't know
Gear currently recycled				X	
Gear potentially recycled				X	

To your knowledge, which kind of gear/material are currently recycled?

Currently, only gillnets are possible to recycle, as they contain enough plastic components. Trawls are not suitable for recycling at least with currently available design and technology.

13. Which measures could potentially increase recycling rates?

- Introduction of EPR or bring back schemes
- Investment in recycling facilities
- Change in material (specify)
- Management of transport of gear from ports to waste management/recycling facilities

14. Is preparation for re-use undertaken in your country or sea area?

- No, none

FURTHER COMMENTS

Please use this space to add further comments, explanations and suggestions (for example concerning possible other measures that would help reducing marine litter from sea based activities, improve reporting of lost gear or increase recycling rates).

If you can provide useful data sources or indicators regarding the economic, social and environmental impacts of lost fishing gear, or the costs and impacts of retrieval, please provide a link here.

- <https://www.marelittbaltic.eu/calender/conference>
- <https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5a27b4b44192020510746e73/1512551631092/Environmental+Impact+Assessment.pdf>