

## **Baltic Sea Centre's reply to DG ENV's consultation on reducing marine litter: action on single use plastics and fishing gear**

We welcome the initiative to tackle these macroplastic sources. Given the recent UNEA resolution on marine litter and microplastics, the EU has both the opportunity and the responsibility to implement effective source-to-sea reduction measures.

In doing so, there needs to be a link made to microplastics as both single use plastics and fishing gear may fragment into microplastics or even nanoplastics, which can be taken up by aquatic organisms and cause harm.

Additionally, if the aim is to get to grips with marine litter, then two missing aspects in the inception impact assessment are littering and illegal dumping of waste from ships as well as wear and tear from floating devices, e.g. buoys and docks of expanded polystyrene.

We further believe that efforts regarding fishing gear should include not only nets, but also other types of plastic litter generated from the fisheries sector, such as plastic boxes, ropes and dolly ropes.

The basis for an EU intervention in this area is clear, and building on the experience of e.g. the implementation of the plastic bag directive, there is scope to introduce similar measures tackling other single use plastics (SUPs). For instance, deposit return schemes for bottles have proven successful in both new and old Member States.

But as a 100 percent capture rate can never be guaranteed, the first hand choice should be to replace SUPs. With any new material proposed, whether bioplastics or other, a thorough analysis including life-cycle assessments, which take the risk of littering and material degradation into consideration, needs to be carried out.

In this context, standards for an acceptable degradation, including degradation time, need to be established for all new materials. These standards need to take environmentally relevant conditions into account, which means to include both fresh, brackish and saline water, with and without UV exposure, and in different temperatures, including cold water.

Oxoplastics or other types of plastics that are designed to fragment, but which do not degrade, should be banned.

### **Stockholm University Baltic Sea Centre**



The first hand choice for fishing gear, as with SUPs, should be to develop more environmentally appropriate materials. Further, experiences from local and national Fishing for Litter initiatives, where the fisheries industry take on the responsibility for bringing marine litter back to ports, can be built on at EU level. In order for such an upscaling to be successful, port reception facilities need to be made more accessible, something that can be facilitated by designated EU level funding opportunities.

A deposit refund scheme should also be explored for the fisheries sector and could be introduced for nets and equipment that risk being lost or discarded at sea. This would also help in raising recycling rates. Additionally, vessels could be mandated to report the loss of gear, and a ban should be considered for materials that are designed to break apart during their use in the industry.

Finally, in order to evaluate if the measures stemming from this impact assessment actually will contribute to a significant reduction of the environmental damage in the future, the EU needs to address the lack of common definitions, harmonized standards and methodologies for measurement and monitoring of marine litter.