Dear Director General Machado,

Port Reception Facilities


However, the NSAC is of the opinion that a generic set of measures cannot always be prescribed in respect of all fishing ports (often no more than a single pier) and fishing vessels, most of them small-scale. Many ports and piers are often small and at a remote location. Specific made-to-measure regulations by individual Member States for these locations will in many cases lead to a more practical and a more effective solution than generic prescriptive rules in a European Directive. The new regulation should recognise these specificities and set the framework only while allowing for tailor-made solutions, especially where financing is concerned.

The directive should also specify that measures should aim at three main flows of waste:

1) household garbage;
2) hazardous waste;
3) waste related to (maintenance of) fishing gear, including dolly ropes, steel wire, etc.
For all three types of waste, disposal facilities must be made available on every port and pier, aiming at maximum recycling of materials. NSAC is of the opinion that this should be a joint responsibility of (organisations of) fishers and port operators. The directive should allow for bottom up initiatives and local financing in this respect.

In addition, specific solutions must be found and made possible for organising and financing the collection and disposal of waste collected in fishing nets during fishing operations, waste resulting from the so-called ‘fishing for litter’ (or equivalent) initiatives. Fishers should be encouraged to bring this waste ashore. Collection facilities should be made readily available, and disposal should be free of charge to fishers. A charge for fishers, especially in very small-scale fishing operations, could have the unintended consequence that fishers fail to collect, or discharge at sea, litter they would otherwise have brought ashore for safe disposal. At most, all that should be needed for local waste disposal facilities and protocol is a single annual inspection to establish that they are fit for purpose.

NSAC is of the opinion that, although nation-wide systems of extended producer responsibility leading to systems of deposit money for waste collection and recycling may be practical in certain industries, this is not the case for fishing gear. Suppliers are geographically spread and the costs of managing such a system will be high. Components such as netting, ropes, cables, chains etc. used to compile a complex fishing gear are procured from many (international) sources and extended producer responsibility is not traceable, creating an obstacle to cost recovery. Examples of effective and cost-efficient voluntary systems (such as the Icelandic) are available.

In summary, NSAC is of the opinion that a voluntary, bottom up system must be part of the new directive, as such a system will be more effective at a lower cost.

Yours sincerely,

Niels Wichmann
NSAC Chairman