

The North Sea Advisory Council

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Director General João Aguiar MACHADO
DG-Mare
European Commission
1049 Brussels
BELGIUM

Cc; Member State Members of Scheveningen Group
Members of the PECH Committee

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Dear Director General Machado,

Port Reception Facilities

The North Sea Advisory Council (NSAC) welcomes any initiative to reduce marine litter. The NSAC is therefore positive about the European Parliament and Council proposal for a directive on port reception facilities for the delivery of waste from ships (2018/0012(COD)), repealing Directive 2000/59/EC and amending Directive 2009/16/EC and Directive 2010/65/EU.

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.

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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

