**Paper No. 6.1 Paper for Discussion**

**Ecosystem Working Group**

**4th September 2018**

**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 are 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 member state made to measure regulations 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 allow for tailor made solutions, especially where financing is concerned.

 These measures should aim at three main flows of waste:

1) household garbage;

2) hazardous waste;

3) waste related to (maintenance of) fishing gear.

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 this to 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, results from the so called ‘fishing for litter’ (or equivalent) initiatives. Fishermen should be encouraged to bring this waste ashore. Collection facilities should be easily available, and disposal should be free of charge.

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. 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. NSAC is therefore 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,