

Position statement from KIMO International on the implementation of EU DIRECTIVE 2019/883 at national level as it pertains to the management of passively fished waste

Background

KIMO and Fishing for Litter

KIMO is an association of municipalities which work together to clean up the oceans and protect coastal communities from the effects of pollution. KIMO finds long-term solutions to marine environmental problems through lobbying at national/EU/international level and through projects and initiatives.

KIMO has a wide network of members in Belgium, Denmark, the Faroe Islands, Germany, Ireland, Lithuania, the Netherlands, Norway, Sweden and the UK and shares and promotes best practices and innovative solutions to combat marine litter.

One of KIMO's most successful projects is Fishing for Litter. Conceived by KIMO in 2001, Fishing for Litter has established itself as the leading scheme for fishers to remove marine litter from the sea. As well as the physical removal of marine litter, the scheme provides a valuable means of education and awareness raising within the fishing industry of the problems caused by marine litter. Additionally, it gives participating fishers a sense of ownership and of making a personal and tangible contribution to the reduction of marine litter in the oceans.

The Fishing for Litter project has now expanded across Europe and is administered by an array of organisations ranging from national governments to small NGOs.

Revision of the Port Reception Facilities Directive

In January 2018 the European Commission published its proposal for the revision of EU Directive 2000/59/EC on Port Reception Facilities. Under the International Convention for the Prevention of Pollution from ships (the 73/78 MARPOL Convention), the discharging of all forms of plastics into the sea is banned but it remains the case that a proportion of marine litter in EU seas comes from ships and fishing vessels. The main objective of the revision is to reduce discharges of waste from ships into the marine environment through a combination of economic incentives, enforcement and exemptions.

One of the key elements of the revised Directive is the introduction of a framework for fee systems through which Member States are required to ensure that the costs of port reception facilities for ship-generated waste, including the treatment and disposal of the waste, are covered through the collection of a fee from ships. Key to the fee framework is that it should provide no incentive for ships to discharge their waste into the sea.

What is the issue?

As the revised PRF directive (DIRECTIVE (EU) 2019/883) is transcribed into national law, it is becoming clear that EU member states have very different interpretations as to the requirements of the directive, especially with regards to passively fished waste. It is KIMO's opinion that some of these interpretations run directly counter to the requirements of the directive and through disincentivising policies risk increasing marine litter in European waters in direct contradiction to the stated aims of the directive.

If the Directive is to achieve its stated goal of reducing marine litter and improving the health of European waters, KIMO proposes that the following principles should be adhered to by each member country when the directive is implemented at national level:

- 1) No increase in the indirect fee paid by fishers in order to cover the disposal costs of passively fished waste
- 2) Existing Fishing for Litter schemes should continue to be funded and expanded
- 3) Wherever possible new Fishing for Litter schemes should be implemented
- 4) Passively fished waste should be treated as a separate waste stream: volume and quantity should be recorded and monitored
- 5) The establishment of alternative cost recovery systems to cover 100% of the handling and disposal costs for passively fished waste is absolutely essential

Each of these points shall be discussed in turn in the sections that follow.

KIMO Recommendations for implementation of DIRECTIVE (EU) 2019/883

KIMO Recommendation 1: No increase in the indirect fee paid by fishers in order to cover the disposal costs of passively fished waste

Some of the confusion surrounding the implementation of the revised PRF Directive seems to originate from paragraph 30 of the directive which states:

To address the problem of marine litter effectively, it is fundamental to provide the right level of incentives for the delivery of waste to port reception facilities, in particular waste as defined in Annex V to the MARPOL Convention ('MARPOL Annex V waste'). This can be achieved through a cost recovery system which requires the application of an indirect fee. That indirect fee should be due irrespective of the delivery of waste and should give the right of delivery of the waste without any additional direct charges. The fishing and recreational sector, given their contribution to the occurrence of marine litter, should also be subject to the indirect fee.

The category of 'MARPOL Annex V waste' includes both operational waste and passively fished waste. If this were all that was written in the directive concerning passively fished waste, one might conclude that the directive makes provision for fishing vessels to be charged an indirect fee in order to cover the costs associated with the disposal of passively fished waste. However, the directive should be read as a whole. As such paragraph 30 needs to be read in conjunction with paragraph 31 and Article 8.2 (d) which both qualify paragraph 30:

DIRECTIVE (EU) 2019/883 (31)

In certain Member States, schemes have been set up to provide alternative financing of the costs of collecting and managing fishing gear waste or passively fished waste ashore, including 'fishing for litter schemes'. Such initiatives should be welcomed, and Member States should be encouraged to complement the cost recovery systems set up in accordance with this Directive with the fishing for litter schemes to cover the costs of passively fished waste. As such, those cost recovery systems, which are based on the application of a 100 % indirect fee for MARPOL Annex V waste, excluding cargo residues, should not create a disincentive for fishing port communities to participate in existing delivery schemes for passively fished waste.

DIRECTIVE (EU) 2019/883 Article 8.2(d)

in order to avoid that the costs of collection and treatment of passively fished waste are borne exclusively by port users, Member States shall cover, where appropriate, those costs from the revenues generated by alternative financing systems, including by waste management schemes and by Union, national or regional funding available;

The directive clearly makes special provision for passively fished waste and requires it to be treated differently to the rest of the operational waste. Indeed the Directive goes so far as to require the monitoring of passively fished waste as a separate waste stream (Article 8.7)

Passively fished waste is different to every other waste stream being delivered to port reception facilities in that it is the only waste stream which was not generated by the vessel landing the waste. This point should be taken into account when calculating the indirect fee for fishing vessels. No portion of the indirect fee paid by fishing vessels should be used to cover the costs of passively fished waste. The handling and disposal costs for passively fished waste should be covered by alternative cost recovery methods. This might mean that it is included in the indirect fee for other port users as in the Netherlands, where other non-fishing vessels, ports and various government agencies all contribute in order to cover the full costs of processing passively fished waste.

No disincentives

As such, those cost recovery systems, which are based on the application of a 100 % indirect fee for MARPOL Annex V waste, excluding cargo residues, should not create a disincentive for fishing port communities to participate in existing delivery schemes for passively fished waste.

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Some may argue that the increase in the indirect fee in order to cover the disposal costs for passively fished waste would not be a disincentive as the fee increase would be relatively minor. However, KIMO strongly disagrees with this opinion. Based on discussions with fishers from across the Fishing for Litter network, it has emerged that the disincentive is not the size of the fee but that a fee for landing passively fished waste is charged at all.

Ronchi et al. (2019) write of the implementation of Fishing for Litter projects in the Adriatic-Ionian microregion, noting that the disposal of marine litter was "free of charge" and did not require extra fees for fishermen in any pilot project. The authors state that this was identified as a facilitating condition for FFL implementation.

A UK government funded assessment of the Fishing for Litter scheme (DEFRA 2014) found that participation in the scheme had a positive educational effect on fishers. Participating fishers reported a shift in attitude and awareness around the problem of marine litter which in turn produced long term behavioural change and an increased commitment to keep pollution out of the ocean. KIMO argues that to brand the fishers who are landing passively fished waste as 'polluters' who need to pay towards the disposal of passively fished waste is wrong-headed and unjust. Marine litter may be partially comprised of fishing sector waste but it is a near certainty that the Fishing for Litter vessel landing the waste is not the source of this waste. To increase the indirect fee for vessels participating in Fishing for Litter is a gross misapplication of the 'polluter pays' principle. The closest analogy would be to charge volunteers who participate in a beach clean for disposing of the litter they have voluntarily collected since the litter is generated by 'the public' and the volunteers are members of the 'the public'.

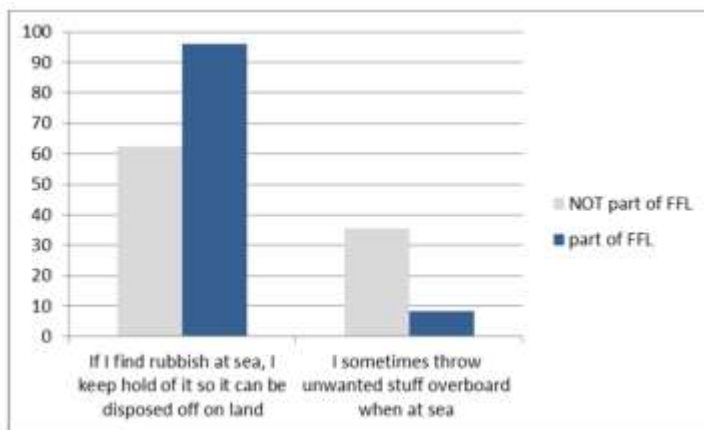


Figure 1- Behavioural change from participation in FFL (DEFRA 2014)

Additionally while marine litter is composed of waste from numerous sectors including the maritime transport sector, the tourism industry, manufacturing industry and other land-based sources, it is the fishing vessels alone who are removing this marine litter from the ocean. The fishers involved with fishing for litter schemes are thus not just cleaning up fishing industry waste but also cleaning up after non-fishing-related industries. Fishing vessels are devoting time, fuel and personnel to sort and separate out passively fished waste, to stow it onboard, to transport it back to shore and to dispose of it appropriately. The time/costs for landing marine litter is not reimbursed to them. They are doing it as an unpaid service. Fishers are delivering an in-kind contribution to the cost of removing marine litter from the ocean.

Given that fishers are already volunteering time and resources to remove marine litter from the ocean and that the waste thus removed does not originate from the boat in question, fishers perceive the charging of any fee to pay for the disposal of this waste as a bad faith action which disregards their voluntary efforts and acts as a disincentive to continue landing passively fished waste.

There is no way to increase the indirect fee on fishing vessels in order to cover the costs of passively fished waste without creating a disincentive to land passively fished waste. If the directive is read as a whole, increasing the indirect fee on fishers in order to pay for the disposal of passively fished waste should not be done. The handling and disposal costs for passively fished waste should be recouped through alternative cost recovery systems as is done in Fishing for Litter projects. The success of the Fishing for Litter projects has been built on the cornerstone that landing passively fished waste does not cost the fishing vessel any money.

Of course fishing vessels generate operational waste and an indirect fee on fishing vessels to contribute towards the handling and disposal of operational waste is appropriate. It is imperative, however, that the costs for disposal of passively fished waste are not covered by means of the indirect fee on fishing vessels but rather through an alternative cost recovery system (i.e. national, regional or EU funding or through projects funded by a combination of private and public funders). The indirect fee which fishing vessels pay should be applied to the disposal costs for operational waste but not for passively fished waste. It is furthermore imperative that when fishing vessels are presented with the indirect fee, it is made abundantly clear to them that the fee is applied to operational waste only in order to prevent any disincentive to them landing passively fished waste.

A 2019 study (Wyles et al. 2019) shows that a big motivator for taking part in the Fishing for Litter scheme is the feel-good factor of doing something positive for the environment and being able to show the fishing industry in a good light. The positive social appreciation accrued from participation in Fishing for Litter is important to fishers. If, however, the revised PRF Directive is implemented at national level in such a way that fishers are made to feel that they are simply 'cleaning up after themselves' – the intrinsic driving motivation to land passively fished waste will disappear as the practice no longer has the positive social karma associated with it.

KIMO Recommendation 2: Existing Fishing for Litter schemes should continue to be funded and expanded

The revised PRF Directive clearly states:

In certain Member States, schemes have been set up to provide alternative financing of the costs of collecting and managing fishing gear waste or passively fished waste ashore, including 'fishing for litter schemes'. Such initiatives should be welcomed, and Member States should be encouraged to complement the cost recovery systems set up in accordance with this Directive with the fishing for litter schemes to cover the costs of passively fished waste. As such, those cost recovery systems, which are based on the application of a 100 % indirect fee for MARPOL Annex V waste, excluding cargo residues, should not create a disincentive for fishing port communities to participate in existing delivery schemes for passively fished waste.

DIRECTIVE (EU) 2019/883 (31)

Since the initial trial project in 2001, Fishing for Litter has "established itself as the leading scheme for fishers to remove marine litter from the sea." (DEFRA 2014). The scheme has had excellent uptake from fishers and has proved remarkably effective and robust. Following the MSC Zoe incident, for example, the Dutch Fishing for Litter scheme effectively doubled its haul of marine litter from 300 tonnes to over 600 tonnes annually in 2019/20.

Besides physically removing marine litter from the ocean, the project also is effective as an awareness raising and educational tool. Forty-two percent of fishers participating in Fishing for Litter reported that the scheme had changed the way they thought about waste in general (DEFRA 2014). As a result of participating in the scheme, fishers' awareness about the extent of marine litter and the effect it was having on the environment and wildlife increased and they stated being more conscientious regarding waste. (DEFRA 2014)

Fishing-for-Litter can contribute to changing practices and culture within the fishing sector, provide a mechanism to remove marine litter from the sea and seabed, and raise awareness among the fishing industry, other sectors and the general public. Fishers provided examples of how their behaviour has changed over time since joining the scheme from no longer throwing waste produced on board overboard to doing more pro-environmental acts on land and at sea such as recycling (Wyles et al. 2019)

The revised PRF directive clearly recognises the effectiveness of the scheme and encourages countries to continue their support for Fishing for Litter.

OSPAR's Regional Action Plan for Marine Litter recognises the effectiveness of the project and in 2019 OSPAR called on contracting parties to double participation in Fishing for Litter schemes.

The purpose of the revised PRF Directive is to decrease the amount of waste entering the ocean by increasing the range and quality of port reception facilities such that all forms of waste from ships can be discharged in port within a reasonable timeframe and at a cost that is not prohibitive.

Recognising the positive incentive provided by Fishing for Litter schemes, the Directive recommends that countries *"complement the cost recovery systems set up in accordance with this Directive with the fishing for litter schemes to cover the costs of passively fished waste."*

Bear in mind that costs will not increase linearly as the project scales up since there are existing administration structures in place and the new project areas are not starting implementation from ground zero.

KIMO Recommendation 3: Wherever possible new Fishing for Litter schemes should be implemented

The purpose of the revised PRF Directive is to decrease the amount of waste entering the ocean by increasing the range and quality of port reception facilities such that all forms of waste from ships can be discharged in port within a reasonable timeframe and at a cost that is not prohibitive.

Not only are existing Fishing for Litter schemes welcomed by the Directive (Paragraph 31) but new "fishing for litter schemes to cover the costs of passively fished waste" are also mandated. To dismantle a Fishing for Litter scheme and simultaneously increase the indirect fee in order to recoup costs for passively fished waste (as is currently being proposed in Norway) runs directly counter to the spirit and letter of the revised PRF directive.

KIMO Recommendation 4: Passively fished waste should be treated as a separate waste stream: volume and quantity should be recorded and monitored

Keeping Fishing for Litter waste as a separate waste stream is required by the Directive:

Member States shall ensure that monitoring data on the volume and quantity of passively fished waste are collected, and shall report such monitoring data to the Commission. The Commission shall, on the basis of those monitoring data, publish a report by 31 December 2022 and every two years thereafter.

DIRECTIVE (EU) 2019/883 Article 8.7

As such, not only should it be possible to calculate accurately the costs incurred by processing and disposal of passively fished waste but also the information thus gained can be used to design alternate cost recovery systems sufficient to cover these costs in full and thus avoid an increase of the indirect fee to cover the cost of passively fished waste being imposed on fishing vessels.

The monitoring and recording of passively fished waste allows geographical marine litter data to be correlated with the position of specific fishing grounds. This provides valuable insight to identify marine litter trends and allows for targeted measures to address persistent problem areas. Fishing

for litter waste monitoring complements other marine litter monitoring data and allows for a more complete picture to be built up as to sources and pathways of marine litter. In the long term such data is valuable for both the fishing industry and policy makers as it facilitates targeted measures to improve the environmental health and productivity of our seas.

KIMO Recommendation 5: The establishment of alternative cost recovery systems to cover 100% of the handling and disposal costs for passively fished waste is absolutely essential

The revised PRF directive acknowledges the special status of passively fished waste. Since the vessel landing such waste is not the originator of that waste, the costs for processing passively fished waste must be recouped, not from fishing vessels but through other means of funding:

in order to avoid that the costs of collection and treatment of passively fished waste are borne exclusively by port users, Member States shall cover, where appropriate, those costs from the revenues generated by alternative financing systems, including by waste management schemes and by Union, national or regional funding available;

DIRECTIVE (EU) 2019/883 Article 8.2(d)

Ronchi et al. (2019) write of the implementation of Fishing for Litter projects in the Adriatic-Ionian microregion, noting that the disposal of marine litter was "free of charge" and did not require extra fees for fishermen in any pilot project. The authors state that this was identified as a facilitating condition for FFL implementation.

In countries where Fishing for Litter schemes are operational, not all ports participate in the scheme. When implementing the revised PRF at national level, there may thus be a need to scale up the existing Fishing for Litter project to ensure that all ports can accept passively fished waste. The inclusion of extra ports may entail an increase in operational costs beyond the available budget. The temptation to recover the shortfall in funding by increasing the indirect fee on fishing vessels should be avoided. Instead, the funding structure for the existing Fishing for Litter project should be reviewed and additional funding partners should be brought in to cover the increased operational costs. (see table below)

Existing Fishing for Litter schemes are funded in a wide variety of ways:

Country	Source of funding
Belgium	National government, Local government, Business sponsors, EU project
Croatia	EU project
Germany	National government, EU project
Greece	Business sponsors, Foundation
Ireland	National government, EU project
Italy	Local government, Business sponsors, EU project
Netherlands	National government, Local government, Business sponsors
Norway	National government
Spain	EU project

UK (England)	National government, Local government, Business sponsors, Foundation, EU project, Fish Producer Organisations
UK (Northern Ireland)	National government, EU project
UK (Scotland)	National government, Local government, Business sponsors, EU project, Donations

Bear in mind that costs will not increase linearly as the project scales up since there are existing administration structures in place and the new project areas are not starting implementation from ground zero.

Where landfill taxes make up a significant portion of the operational costs for Fishing for Litter schemes, national authorities may consider waiving or reducing such taxes for passively fished waste. This would facilitate the establishment of new Port Reception Facilities for passively fished waste at minimal cost. Such an arrangement would need to be time limited or in the longer term apply to only that portion of passively fished waste which is not recyclable lest it act as a disincentive for Fishing for Litter projects to develop robust recycling systems.

National Implementation of the revised PRF Directive – 3 case studies:

Norway

The Fishing for Litter scheme in Norway is funded by the national Government through the Norwegian Environmental Agency's funding scheme for measures against marine litter. It is administered by Norwegian NGO, SALT.

At present the revised PRF is being implemented in Norway. In December 2020 the Norwegian Environment Agency and the Norwegian Maritime Directorate sent a joint recommendation to the Ministry of Climate and Environment that proposes some amendments to the Pollution Control Regulations, with a view to facilitating more reuse and recycling of waste. The detail of the proposal is to phase out the Fishing for Litter scheme in Norway and instead to increase the indirect fee on fishing vessels. Norwegian fishing vessels will be subject to an annual fee increase of 1000-1400 NOK. They argue that since the current scheme is expensive to administer and only operates in eleven Norwegian ports, a large increase in funding would be required to scale the Fishing for Litter scheme to all fishing ports.

To dismantle an existing Fishing for Litter scheme and simultaneously increase the indirect fee in order to recoup costs for passively fished waste runs directly counter to the spirit and letter of the revised PRF directive. Not only does such a policy risk disincentivising fishers from collecting and landing passively fished waste, it also fails to take into account the important behavioural changes that Fishing for Litter promotes in fishers and thus is likely to decrease the amount of passively fished waste being landed and also increase the amount of littering at sea.

The Netherlands

The first Fishing for Litter trial project started in the Netherlands and twenty years later, the project is still going strong. The Fishing for Litter scheme in the Netherlands attracts funding from a wide array of sources: business sponsors, local government, national government.

At present, the revised PRF directive is being implemented in the Netherlands. It is expected that this will be finalized during the 2nd half of 2022, with 2022 being a transitional period during which negotiations with the ports are ongoing.

Notably, fishing vessels do not pay towards the costs of processing passively fished waste. Instead, these costs will be recouped through project funding, sponsors and the collection of indirect fees from other port users. These fees will be collected by the ports and paid to the Fishing for Litter scheme for dealing with the waste costs. Through national government, other financing is provided for the educational and promotional aspects of Fishing for Litter which is fundamentally important to changing littering behaviour.

The funding system is complex but the project in the Netherlands demonstrates that it is possible to offer nation-wide port reception facilities for passively fished waste without imposing any additional charges on fishing vessels for landing this waste.

The model has proved its resilience under strain when, following the MSC Zoe incident, the tonnage of passively fished waste landed by the Dutch scheme doubled for two years running. Despite this huge increase in waste landed, the scheme was able to secure alternative funding to cover the

disposal costs and no costs were passed on to the fishing vessels. Fishing for Litter in the Netherlands remains one of the most successful schemes in Europe.

United Kingdom

Fishing for Litter in the UK is funded partly by the national governments and partly through private grants and is implemented by KIMO. The project funding covers 100% of the costs for the processing of Fishing for Litter waste. Fishers are not currently required to pay any part of the costs (including any additional indirect fee) for the removal or disposal of passively fished waste. This is likely to continue to be the case since the educational and behaviour-changing outcomes within the fishing industry of Fishing for Litter participation are considered to be extremely significant in long-term reduction of the amount of fisheries waste in the seas and coastlines around the UK.

Conclusion

The case studies presented above illustrate the versatility of the Fishing for Litter project and show that it can be funded in a number of different ways. The examples from the Netherlands and the UK illustrate that it is possible for Fishing for Litter schemes to implement 'DIRECTIVE (EU) 2019/883' without increasing the indirect fee on fishing vessels in order to cover the costs of managing passively fished waste. The arrangements required to maintain a system of '*no indirect fee for passively fished waste*' will need to be tailored to each individual country. It will require creativity and negotiation to achieve, however, such a system is not only possible but necessary if the revised PRF Directive is to have its intended effect of reducing marine pollution. A fragmented reading of the revised PRF Directive which disincentivises the landing of passively fished waste does not meet the requirements of the Directive and will result in an increase of marine pollution.

Therefore KIMO, taking into account:

- (i) the need to protect the marine environment from the increasing burden of pollution from plastics and other forms of marine litter**
- (ii) all available evidence regarding the efficacy of Fishing for Litter**
- (iii) the wider impact of Fishing for Litter with regards to positive behavioural and attitudinal shifts within the fishing industry**
- (iv) the usefulness to policy makers of data generated from a separate Fishing for Litter waste stream**
- (v) the necessity of maintaining a system of 'no direct or indirect fee' if policy makers are serious about incentivising voluntary landings of passively fished waste**
- (vi) the requirements of DIRECTIVE (EU) 2019/883**

Urges the Norwegian Government to:

- 1) Continue funding the Fishing for Litter project in Norway**
- 2) Expand the project to all Norwegian fishing ports**
- 3) Explore alternative supplementary financing mechanisms for the Fishing for Litter project in Norway to make the continuation and expansion of Fishing for Litter in Norway possible**

ANNEX 1: Passively fished waste in the revised PRF directive

All relevant legislation relating to passively fished waste in the revised PRF directive is excerpted below:

DIRECTIVE (EU) 2019/883 (14)

[European] Union maritime policy should aim at a high level of protection of the marine environment taking into account the diversity of the maritime areas of the Union. It should be based on the principles that preventive action should be taken and that damage to the marine environment should, as a priority, be rectified at source and that the polluter should pay.

DIRECTIVE (EU) 2019/883 (30)

To address the problem of marine litter effectively, it is fundamental to provide the right level of incentives for the delivery of waste to port reception facilities, in particular waste as defined in Annex V to the MARPOL Convention ('MARPOL Annex V waste'). This can be achieved through a cost recovery system which requires the application of an indirect fee. That indirect fee should be due irrespective of the delivery of waste and should give the right of delivery of the waste without any additional direct charges. The fishing and recreational sector, given their contribution to the occurrence of marine litter, should also be subject to the indirect fee. However, where a ship delivers an exceptional amount of MARPOL Annex V waste, especially operational waste, which exceeds the maximum dedicated storage capacity as mentioned in the advance notification form for waste delivery, it should be possible for an additional direct fee to be charged in order to ensure that the costs related to receiving this exceptional amount of waste do not cause a disproportionate burden on a port's cost recovery system. This might also be the case where declared dedicated storage capacity is excessive or unreasonable.

DIRECTIVE (EU) 2019/883 (31)

In certain Member States, schemes have been set up to provide alternative financing of the costs of collecting and managing fishing gear waste or passively fished waste ashore, including 'fishing for litter schemes'. Such initiatives should be welcomed, and Member States should be encouraged to complement the cost recovery systems set up in accordance with this Directive with the fishing for litter schemes to cover the costs of passively fished waste. As such, those cost recovery systems, which are based on the application of a 100 % indirect fee for MARPOL Annex V waste, excluding cargo residues, should not create a disincentive for fishing port communities to participate in existing delivery schemes for passively fished waste.

DIRECTIVE (EU) 2019/883 Article 8.2(d)

in order to avoid that the costs of collection and treatment of passively fished waste are borne exclusively by port users, Member States shall cover, where appropriate, those costs

from the revenues generated by alternative financing systems, including by waste management schemes and by Union, national or regional funding available;

DIRECTIVE (EU) 2019/883 Article 8.7

Member States shall ensure that monitoring data on the volume and quantity of passively fished waste are collected, and shall report such monitoring data to the Commission. The Commission shall, on the basis of those monitoring data, publish a report by 31 December 2022 and every two years thereafter.

References

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