

Ares (2018) 3968 723

Subject:

FW: Fishing industry criticism - Proposal on the reduction of the impact of certain plastic products in the environment

From: [REDACTED] (HR)

Sent: Tuesday, May 29, 2018 4:26 PM

To: [REDACTED]

Cc: [REDACTED]@cepesca.es; [REDACTED] (CAB-VELLA); [REDACTED] (CAB-VELLA)

Subject: RE: Fishing industry criticism - Proposal on the reduction of the impact of certain plastic products in the environment

Dear Mr. [REDACTED]

Referring to [REDACTED] e-mail I would like to propose 21st June at 15:00 or 22nd June at 11:00.

In purpose to provide you the e-pass(es) for Berlaymont building, I need participant(s) details such as: name, date of birth, nationality and ID number.

I will be grateful for your reply.

Kind regards,

[REDACTED]

From: [REDACTED] (CAB-VELLA)

Sent: Tuesday, May 29, 2018 1:36 PM

To: [REDACTED]

Cc: [REDACTED]@cepesca.es; [REDACTED] (CAB-VELLA); [REDACTED] (HR)

Subject: RE: Fishing industry criticism - Proposal on the reduction of the impact of certain plastic products in the environment

Dear [REDACTED]

Many thanks for your mail and for having shared with us your position.

I would like to invite you for a meeting with my colleague, [REDACTED] (in CC), and myself to further explain the proposal and to discuss your concerns. Our assistant, [REDACTED] will be in touch with you to find a suitable appointment.

Best regards

[REDACTED]

From: [REDACTED] [mailto:daniel.voces@europeche.org]

Sent: Monday, May 28, 2018 8:41 PM

To: [REDACTED] (CAB-VELLA)

Cc: [REDACTED]@cepesca.es

Subject: Fishing industry criticism - Proposal on the reduction of the impact of certain plastic products in the environment

Dear [REDACTED]



I hope this email finds you well.

We would like to inform you about our discontent with the messages disseminated by the European Commission regarding the proposal on the reduction of the impact of certain plastic products in the environment. Please find below some of the main arguments.

I would like to stress that the fishing industry is fully committed to engage in innovative initiatives to prevent, recover, reuse and recycle of fishing gears. This is already the case at present. As an example, thanks to their partnership with KIMO, over 500 fishing vessels landed 2500 tonnes of waste from the sea between 2011-2016.



It is therefore quite frustrating for our members, who are investing time and efforts in these activities, to observe this unfair campaign launched by the European Commission.

Best regards,



Managing Director
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From:  [mailto:@europeche.org]

Sent: lundi 28 mai 2018 20:23

To:

Subject: RE: Proposal on the reduction of the impact of certain plastic products in the environment

Dear ENV Marine Team,

As much as we applaud the introduction of the Extended Producer Responsibility scheme regarding fishing gears, there are certain messages published by the European Commission that are not portraying the fisheries reality.

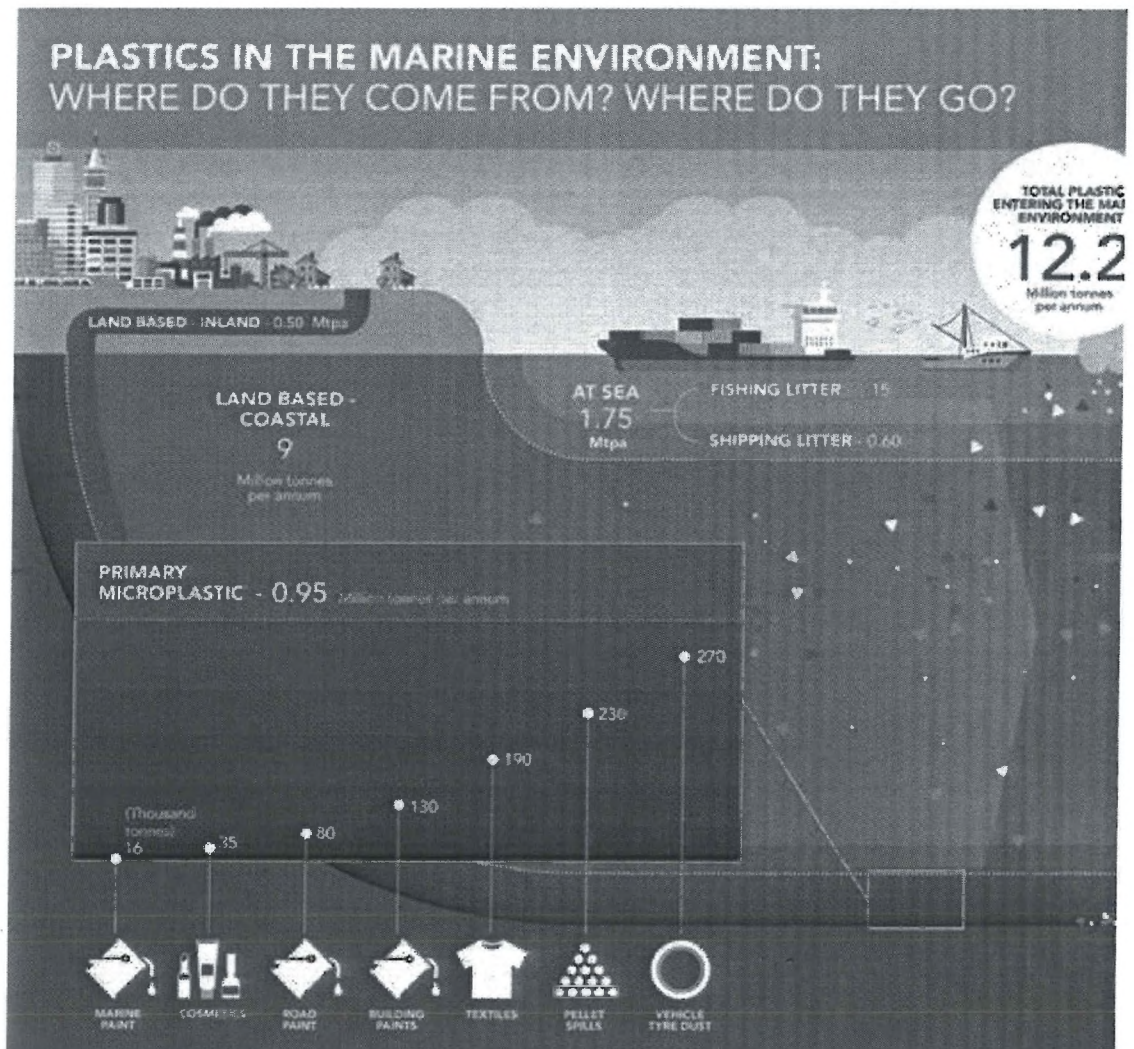
For instance, the following statement from DG MARE press release is far from being true:

- Abandoned, lost or disposed of fishing gear accounts for about a third of marine litter found in European seas, or over 11.000 tons per year.

As reported by the Eunomia report on Plastics on the Marine Environment (see also infographic below), used by the European Commission as a sound scientific basis, over 80% of the annual plastic input that ends up in the seas and the oceans comes from land-based sources. Therefore, the statement above is not true, not based on science neither on real facts.

When it comes to the marine environment, fisheries always seems to be the easiest target to blame for all the problems. However, as shown by scientific data, fisheries accounts for a small percentage of the marine litter problem (less than 10%). With the particularity that the sector can also play a role as part of the solution collecting waste at sea.

If the EU genuinely wants to tackle this issue, it should identify where the problems really lie (80% land-based sources) and adopt efficient and adequate measures.



The same happened concerning the **Port Reception Facilities Directive**. Below you can find the data provided by the European Commission in their Impact Assessment. As you can see it is based on vague estimates that, as a consequence, bring about unfair conclusions over the fishing industry impact.

European Commission Impact Assessment - SWD(2018) 21 final

Original Source - Eunomia Research & Consulting, Plastics in the Marine Environment 2016

*At sea sources – mid-point estimate of 1.75 million tonnes per annum (range 0.3 to 3.25 million tonnes per annum). Source: Eunomia Research & Consulting Ltd. (2016). 3 N.B mid-point 'rounded' to 1.75 Mtpa. The above cited report considers the **amount of litter** of all types, not just plastic, from at-sea sources. We therefore amend the total presented in that report on the **assumption** that **55% by weight is plastic**, in line with Barnes, D.K.A., Galgani, F., Thompson, R.C., and Barlaz, M. (2009). The attribution of 65% to fishing sources and 35%*

to shipping sources is referenced in Eunomia Research & Consulting Ltd. (2016), and originally determined by Arcadis (2012):

Europeche Note: There is no reference to these figures in the Arcadis study. In addition, if we make the calculations, the total plastic production from the fishing industry (1.75 mt - 55% - 65%) gives total of 625,625 tonnes of plastic = worldwide figure (and not the European used by the Commission below)!

Impact Assessment – Pages 40-41

*For the fisheries sector, more specific estimates exist in relation to fisheries equipment, including so-called abandoned, lost or otherwise discarded fishing gear (ALDFG), ranging up to **220,000 tons per year for the EU as a whole** (calculations based on Eunomia, 2016) Data from fishing for litter programmes initiated over the past decade suggest that the amount of ALDFG is gradually decreasing, but still a lot of 'old' ALDFG is in Europe's seas. ALDFG is to be passively fished and delivered to port, which is supported by fishing for litter programmes or independently.*

Europeche Note: It is unclear where these calculations come from...(what happened with the 11.000 tons per year stated above?)

Furthermore, based on the latest STECF report, there were 63,976 active vessels in 2015 of which 74% were classed as small-scale coastal vessels, 25% as large-scale and remaining 1%, distant-water vessels. That would mean that each vessel (the majority of them under 12 meters) would discard at sea almost 3.5 tonnes/year of fishing gears. It is also implied that Member States fail to control their fishing fleets which since 2009 (Fisheries Control Regulation) are obliged to mark and identify their gears, have adequate equipment on board to retrieve lost gears and immediately inform coastal authorities in case of loss. This is of course unacceptable and far from reality.

Conclusion : it is clear that marine litter is a growing issue that should be effectively addressed from every angle and it is of utmost importance to identify all relevant elements so as to ensure a comprehensive approach. However, scientific data on the quantity of marine litter entering the oceans is based on projections and estimates from an old FAO report from 2009. This data is being taken by the European institutions as actual figures which in the end are used against the fishing industry. As an example, the infographic below gives the impression that the fishing sector produces most of the 8 million tonnes of plastic that goes into the sea each year... We strongly encourage the European Commission to modify this infographic (which is also mixing European with international figures in an attempt to exaggerate the impact of the fishing sector).



We truly hope that the European Commission starts considering the European fishing industry as an ally against marine litter instead of a menace.

Further information about the vital role played by European fishermen against marine litter can be found [HERE](#).

Best regards,

[Redacted signature]

[Redacted name]

Managing Director
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From: ENV-MARINE-ENVIRONMENT@ec.europa.eu [mailto:ENV-MARINE-ENVIRONMENT@ec.europa.eu]
Sent: lundi 28 mai 2018 16:47
To: Cc:

Subject: Proposal on the reduction of the impact of certain plastic products in the environment

Dear Colleagues,

We are very happy to inform you that the Commission published today the proposal on the reduction of the impact of certain plastic products in the environment; the main objective of this initiative is the prevention and reduction of plastic marine litter from single use plastic items and fishing gear containing plastic. It is assessed that litter from the targeted products accounts for approximately 70% of marine litter (on the basis of items' count,).

The proposal in a nutshell:

- Bans for cotton buds, cutlery, plates, straws, beverage stirrers, sticks for balloons made in plastics;
- Consumption reduction targets (on the model of plastic bags) for food containers (packing food for immediate consumption) and drinks cups;
- Binding separate collection rate of 90% for plastic drink bottles by 2025 combined with product requirements for caps and lids (they have to remain attached to the plastic bottles);
- Labelling requirements on waste disposal options, negative impacts of littering and presence of plastics in the product for sanitary towels/tampons, wet wipes, balloons;
- Extended producer responsibility to financially cover separate collection, treatment of waste, awareness raising measures on littering and clean-up costs for food containers, packets and wrappers, cups, beverage containers, tobacco products with filters, wet wipes, balloons, lightweight plastic bags;
- Extended Producer responsibility scheme for fishing gears containing plastics so that collection, transport and treatment of waste as well as awareness costs are covered by producers (meaning those placing gears on the EU market) of fishing gears.

The coordination with the Programmes of Measures under the MSFD is included in Article 11 of the draft Directive.

You can find the proposal and additional information and explanations in:
https://ec.europa.eu/commission/news/single-use-plastics-2018-may-28_en

The proposal will be presented in the forthcoming meetings of the Marine Directors in Sofia and of the Technical Group on Marine Litter (TG ML) under the MSFD in Larnaca.

We would like to underline that the proposal was made possible by the work of the JRC and the TG ML on the most frequently found litter items on EU beaches, on the basis of the monitoring data provided by the Member States and the Regional Seas Conventions around Europe. This illustrates once more the direct relevance of our work for the effective protection of the coastal and marine environment which, in this case, contributed substantially to making the EU a frontrunner in the global battle against plastic pollution of the seas.

The proposal should be seen in the context of coherent strategic approach the Commission has been advocating to addressing the challenge posed by marine litter, with national action taken in the context of Marine Strategies and regional cooperation at its core, complemented with the EU level action where most appropriate. In this context we would like to congratulate everybody involved in the adoption of the Waste package on 22 May (http://europa.eu/rapid/press-release_IP-18-3846_en.htm) and encourage you to engage in ongoing implementation of the Plastics Strategy

(http://ec.europa.eu/environment/waste/plastic_waste.htm) and process of adoption of the Port Reception Facility Directive proposal.

With best wishes,

 for ENV Marine Team



European Commission
Directorate General for Environment
Unit ENV.C.2 "Marine Environment and Water Industry"
http://ec.europa.eu/environment/marine/index_en.htm