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SOSTENIBLE
DE LOS RECURSOS

Public consultation on the establishment of a quantitative reduction headline target for marine litter

ACR+ contribution

There is no easy way to tackle the issue of marine litter: it is complicated and has many causes, impacts and inputs. Marine litter is a global problem which can be a threat to ecosystems, has socio-economic costs and can also pose a threat to human health.

ACR+, an international network of local and regional authorities in the EU and in the Southern & Eastern Mediterranean Countries (SEMC), promotes the **3R principle** (Reduce, Reuse, and Recycling) and plays a key role in assisting the EU in reducing marine litter **through** its flagship project, the European Week for Waste Reduction including a clean-up campaign.

Before entering in the core of the subject, ACR+ would like to address the problematic issue of the **Mediterranean basin**, one of the most polluted seas worldwide. Because of its current characteristics (narrow coastal band of river basins, population growth (in the South mainly), wastewater diversion in the sea, poor waste management practices,...) and future prospects (increased tourism, rising coastal urbanization,...), the basin will be under stress unless drastic actions are undertaken. Depolluting the Mediterranean Sea will require more than strengthened EU policies targeting the EU-28. Legislative and policy actions as well as institutional set up are very different and in different stages of robustness, leaving the SEMC with rather weak legislative and institutional aspects. The European Neighbourhood and Partnership Instrument (ENPI) and international/bilateral assistance programs addressing the SEMC in the field of waste and wastewater will have to move up a gear if a sustainable and comprehensive marine litter reduction is to be reached.

The actions identified in the public consultation document and the way they are categorized per stakeholder confirm the need for a **multi-stakeholder approach** whereby roles and responsibilities of each actor are identified. However, the actions suggested in the consultation paper can only contribute to the aspirational or binding marine litter reduction targets if considered as joint, reinforcing and cross-actor tuned actions.

In order to achieve ambitious marine litter reduction targets, ACR+ is of the opinion that **prioritizing the actions** would be needed by setting short, medium and long term actions considering assessment criteria such as relevance, feasibility, cost-effectiveness, possible impacts,...

Tackling marine litter and achieving ambitious targets also requires a **multi-policy approach**. Legislative, institutional, financial, socio-cultural, and educational policy aspects, among others, are to be considered, taking into account the specificities of the countries and regional seas.

ACR+ views on addressing marine litter reduction targets

ACR+ is of the opinion that ambitious marine litter reduction targets have to be set while considering the following:

- Draw the attention of policy-makers to the problem and provide the political impetus needed to set the EU on course to achieving the Marine Strategy Framework Directive (MSFD) objective;
- Provide accurate and reliable information on the levels and composition of coastal litter to measure progress both in implementing the Marine Litter Strategy and in achieving the requirements of the MSFD;
- Address the shortcomings in the current legislation. Six policy instruments¹ in particular are identified as having a high potential level of impact: the MSFD, the Waste Framework Directive, the Packaging and Packaging Waste Directive, the Cosmetics Regulation (micro-plastics), and the European Maritime and Fisheries Fund (the funding instrument of the Common Fisheries Policy). This is because they are relevant to a large range of marine litter items and sources, or may have a dramatic impact in terms of reducing an important type of litter. One may assume that the basic framework for addressing this environmental problem is in place. However, several shortcomings in the existing legislation exist, most importantly the need for greater ambition in the current requirements and targets.
- Strengthen implementation of existing legislation. The IEEP study also flags up a worrying implementation gap. No matter how thorough the suite of legislation to tackle marine litter, without full implementation and enforcement by Member States it can have no impact on the problem. It is estimated that the full and effective implementation of the waste policy could already result in significant marine litter reductions, but additional efforts are also needed;
- Consider combined upstream and downstream measures. Marine litter targets should be achieved on the one hand by reducing the levels of additional litter entering the marine environment (upstream measures); and on the other hand by the removal of litter which is currently present on the coast and in the sea (downstream measures);
- Provide a basis for monitoring progress and assessing the success or failure of measures to prevent marine litter from entering the seas.
- Improve the coherence between the national efforts of Member States, which need to be coordinated at a sea basin and at EU level to yield satisfactory results. Again, coherence between Southern EU countries and SEMC are of utmost importance for the depollution of the Mediterranean basin;
- Address any existing knowledge gaps, in particular on possible measures to prevent littering, to identify what type of packaging causes most marine litter and why, on the plastic recycling cycle and on the impact caused to the environment by marine litter in the four marine regions;
- Help raise stakeholder awareness (e.g. local authorities, fishermen, tourists, general public,...) of the marine litter problem and promote behavioural change through a program of learning and communication;
- Provide a robust coastal infrastructure in terms of waste (-water) treatment and litter receptacles;
- Use pertinent legal and economic instruments in order to have a high rate of waste collection.

¹ IEEP, How to improve EU legislation to tackle marine litter, Seas at Risk, July 2013

ACR+ stresses the importance of ambitious targets

The EU-wide target for marine litter could take several forms. It would need to be underpinned by a baseline and accompanied indicators, and based on a detailed impact assessment.

Risks and assumptions regarding setting targets:

- Setting a union-wide quantitative headline reduction target for marine litter first requires a proper baseline data collection through standardized monitoring systems for floating debris, seabed litter as well as beach litter;
- An important consideration regarding indicators is whether to measure the marine litter reduction in units/items or in weight. Both have advantages and disadvantages.

The following **target options** or a combination of options may be considered:

1. A simple overall quantitative EU reduction target (i.e. percentage of reduction by target date as compared to a base year subject to reliable data) covering all of Europe's seas. This would essentially amount to an aspirational target, which would serve the purpose of calling attention to the issue and stimulating action;
2. A simple overall reduction target flanked by suggested actions in various sectors/ actors and at all levels;
3. An overall quantitative EU reduction target backed up by sub-targets per sea basin and/or source of litter (e.g. from shipping or wastewater) and/or litter type (e.g. microplastics, fishing gear...) and/or location (e.g. beach litter, sea-bed litter,...).

More specific (sub) targets as presented in the third option could be aspirational or binding, depending on the legal basis. In any case, the target could be accompanied by an action plan and/or toolbox of measures and best practice.

ACR+ believes, as put forward by the JRC, that, whatever option is taken, a 50% reduction target is feasible if coupled with adequate policy measures. With weak targets, weak measures are likely; with ambitious targets, ambitious measures become more likely.