

Impact assessment questions for revision of PRF Directive – fishing vessels

Q1: Please provide examples of how fishing vessels are currently being incentivised to land their waste or not. Please provide examples of potential schemes to incentivise such delivery.

Fishery ports have a particular challenge with the “stray” waste. Either in the form of waste caught at sea or abandoned gear that is thrown at the port. Danish Ports would like to see a greater political interest in keeping the ports free of national waste tax on marine waste as by catch.

Danish Ports believe that there is a lack of understanding the waste chain from the principle of polluter pays. It is understandable that ports receive waste, but it is wrong to believe, that ports can solve it all. Main problems are up or down stream in the waste chain.

A problem is that the Danish ports receive the stray waste free of charge, but must pay the state a fee for getting rid of it. It is not large amounts, but the principle is wrong. Thus, fishermen and ports – not the polluters - are paying to clean up the oceans.

Fishing is the only profession which takes maritime waste ashore. The fisherman pays in terms of space on the ship. The port uses land, human resources and pays a fee to the state for handling the waste. Environmental management is a natural part of port operations, but fishermen and ports should not be punished by polluters’ wrongdoings.

An overview of the waste volumes is given by data from the five largest Danish fishing ports in 2014 (covering 85 percent of total fish landed in Denmark):

- Total amount of stray waste in 2014: 268.08 tons
- Total amount of state tax for the stray waste in 2014: 127,338.00 DKKR

The cost for handling the stray waste can be divided into the following accounts (based on KIMO fishing for litter analysis from 2004 but updated together with the figures above):

1. Handling, sorting and recycling (land) (65%)
2. Incineration (13%)
3. Landfill (7%)
4. Transport (5%)
5. State charges for stray waste (10%)

Danish Ports’ proposal is to eliminate the state fee of 475 DKKR per ton of stray waste or to compensate ports in other ways. The ports are required to receive ship-generated waste at no cost to the vessels and the fleet has a duty to bring it ashore. Therefore, an exemption or a compensation for the state fee would bring some fairness into the ports fulfilment of environmental responsibility.

Danish position in line with Swedish:

(The starting point is that in Sweden there is a high awareness amongst the population concerning environmental problems and the value of nature. It is a kind of built in system in our society. Therefore it is sometimes hard to understand the nature of this kind of questions.

Of course the fishermen want to contribute to a cleaner sea! Also baring in mind that they are the ones having the problem with the littering. Concerning their own contribution to the littering it is taken care of via the ordinary PRF system. The ghost net problems are mainly a result of "history" and not caused by todays fishermen. The amount of ghost nets left in the sea today are often from recreational fishing in Sweden)

Through different projects and initiatives for example Fishing for Litter and Keep the Sea Tidy (the northern part of the west coast of Sweden). The projects are run in close corporation with the fishermen. They give their views on practical solutions that can simplify their handling of waste and is in that way involved and gain their own responsibility. It's spread among the fishermen, also those not involved in projects. The projects are in that way, "from mouth to mouth" raising the awareness amongst fishermen.

When having beach-cleaning days we also try to involve fishermen. They can tell their story to the beach-cleaners and in that way raising awareness in the total society.

The schemes are set up in different ways.

We have the "no special fee system" in Sweden, a system with the dual purpose of encouraging ships to deliver waste ashore and to avoid undesirable waste streams between ports, thereby encouraging a sound sharing of the waste burden.

Q2: Are the operators of fishing vessels properly consulted in the development and evaluation of the waste reception and handling plans for ports receiving such vessels?

Danish position in line with Swedish:

Yes. The projects/initiatives are run in close corporation with the fishermen. They give their views on practical solutions that can simplify their handling of waste and is in that way involved and gain their own responsibility. They are also informed of the next steps in the handling of the waste in ports and the transportation of waste from the ports.

Q3: In your opinion:

a) should fishing vessels be fully incorporated in the Cost Recovery Systems set up in ports, including the payment of an indirect fee (providing a right to deliver all their waste), to increase the incentive to land waste to PRF?

or

d) is the present system adequate to incentivise these vessels to land their ship-generated waste (SGW)?

d) the present system is adequate

Q4: In your opinion:

a) should fishing vessels be required to pre-notify their waste (through the electronic reporting system) when calling at an EU port?

or

d) is the present system adequate to incentivise these vessels to land their ship-generated waste (SGW)?

d) the present system is adequate

Q5: In your opinion:

a) should fishing vessels be made subject to the specific inspection requirements and control

procedures (applied in the framework of PRF inspections)?

or

d) is the present system adequate for the enforcement of the mandatory delivery of waste from these vessels?

d) the present system is adequate

Q6: What problems could be foreseen if fishing vessels are obliged to respect the general inspection requirements and conditions laid down in article 11?

Danish position in line with Swedish:

That the system will be built without regard to that fishing is a different kind of operation in comparison with other kind of maritime operations. It is not transport of cargo or passengers etc. It is not run by a time schedule.

Different controls by different authorities at different times. It is an urge to combine separate inspections in a single inspection visit.

That inspectors don't have adequate knowledge of the reality of fishing, thus don't understand the necessity of different solutions on board a ship depending on fishing methods, fishing species caught etc.

That the result will be a standardization, a "must have system". Better to build a system saying "this what we want to achieve, solve it in accordance to your logic"

Q7: What would be the impact on employment and or working conditions if the above measures/schemes were implemented?

The above mentioned measures/schemes do not seem to be in line with the Commission REFIT strategy, making EU law lighter, simpler and less costly. There should in stead be a stronger focus on the polluter pays principle.