

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

| Information about you | |
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| Your full name: -open reply-(compulsory) | EXPRA (Extended Producer Responsibility Alliance), Avenue des Olympiades 2, 1140 Brussels. Transparency register ID: 382147211686-77 |
| Your contact email address: -open reply-(optional) | joachim.quoden@expa.eu |
| I'm replying as a(n): -single choice reply-(compulsory) | Sectoral representative |
| If you are responding on behalf of a sector, please specify your area of activity: -single choice reply-(optional) | Waste management |
| If responding on behalf of an organisation/association/authority, please provide the name: -open reply-(optional) | EXPRA (Extended Producer Responsibility Alliance) |
| If responding on behalf of an organisation/association/authority, please specify all countries represented by your membership: -multiple choices reply-(optional) | NL - Netherlands - BE - Belgium - BG - Bulgaria - CY - Cyprus - HU - Hungary - RO - Romania - CZ - Czech Republic - IT - Italy - SK - Slovakia - LU - Luxembourg - EL - Greece - Other - ES - Spain - MT - Malta |
| If another country is represented by your organisation, please specify the country/countries concerned. -open reply-(optional) | Israel, Macedonia, Norway, Turkey, Canada |
| How would you prefer your contribution to be published on the Commission website? -single choice reply-(compulsory) | Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication) |
| How well informed are you about marine litter? -single choice reply-(compulsory) | Very well informed |
| Questionnaire | |
| Feasibility -single choice reply-(optional) | 5 |
| Cost -single choice reply-(optional) | 5 |
| Effectiveness -single choice reply-(optional) | 5 |
| Transferability/replicability in different marine regions -single choice reply-(optional) | 4 |
| Impact on stakeholders -single choice reply-(optional) | 4 |

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| Respect for the polluter pays principle -single choice reply-(optional) | 4 |
| <i>Are there other relevant criteria which should be used when assessing actions aimed at reducing the presence and impact of marine litter? If so, please list these criteria:</i> -open reply-(optional) | On point 2.1.6: It is important to consider who the polluter is in this context and who bears the responsibility for preventing or reducing littering. In this regard, EXPRA would like to promote the principle of shared responsibility as joint efforts by all actors concerned are necessary to solve the littering problem. |
| Entanglement of marine species in discarded fishing gear, ropes and other litter -single choice reply-(optional) | 4 |
| Ingestion of litter by birds, fish and other species -single choice reply-(optional) | 4 |
| Health risk for humans due to consumption of affected seafood -single choice reply-(optional) | 3 |
| Spreading of invasive species -single choice reply-(optional) | 3 |
| Negative impacts on coastal tourism -single choice reply-(optional) | 4 |
| Damage to (fishing) vessels -single choice reply-(optional) | 3 |
| Costs associated with beach clean up -single choice reply-(optional) | 4 |
| <i>Are there other relevant negative impacts of marine litter which should be considered? If so, please list these impacts:</i> -open reply-(optional) | It is also important to consider the negative effects related to beach and coast line pollution, as well as bad odour. |
| Reject single use plastic bags and bottles and use re-usable alternatives -single choice reply-(optional) | 2 |
| Drink tap water instead of bottled water/other bottled beverages -single choice reply-(optional) | 2 |
| Give greater consideration to the packaging used when making purchasing choices -single choice reply-(optional) | 2 |
| Separate waste at home and participate in systems for separate collection and deposit refund systems -single choice reply-(optional) | 4 |
| Avoid littering (either on the beach, at sea or elsewhere) -single choice reply-(optional) | 5 |
| Avoid flushing sanitary waste down the toilet -single choice reply-(optional) | 5 |
| Participate in organised clean-ups -single choice reply-(optional) | 4 |
| Are there other actions which could be | On point 2.5.1: Consumers should be able to choose whether to purchase single |

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| <p>undertaken by consumers to reduce marine litter? If so, please list these actions: -open reply- (optional)</p> | <p>use or reusable products. There is no commonly embraced approach on whether single-use or reusable packaging should be promoted, as various factors need to be considered in this regard (such as the type of product, transport distances etc). On point 2.5.3: There is no general agreement on what criteria (CO2 emissions, content of recycled material etc.) to consider in order to determine whether one piece of packaging is more environmentally friendly than another. As such, it can be difficult for consumers to distinguish 'good packaging' from 'bad packaging' and it is very important to avoid giving misleading information to consumers. On point 2.5.4: This section mixes two different approaches (separate collection and deposit systems). However, the scope, impact and potential benefits of these to tackle marine litter are not comparable. Separating waste at home and participating in the selective collection systems is functioning well and implemented in most EU Member States. Reuse and recycling both contribute to reducing marine litter and significantly reduce the risk of material ending up in the environment . Therefore, initiatives to promote recyclable packaging and separate collection of recyclable packaging, including 'out of home' (e.g. on beaches and other public places), should be further encouraged. The cost of setting up deposit systems for certain packaging (such as plastic bottles) are not proportionate to their environmental benefits. EXPRA is strongly in favour of separate collection but would like to place a lower rating for the implementation of deposit refund systems. While it is true that a deposit system can ensure high return rates, this applies only to the packaging that is covered by the system, leaving a large share of the overall packaging waste out. Consumers may for example be misled to think that the packaging not subjected to deposit schemes has no value, and this can contribute to increased littering. In addition to the actions listed, EXPRA would also like to stress the importance of information campaigns to consumers, both by public and private actors, as these ensure that consumers are aware of the importance of separate collection, recycling and non-littering.</p> |
| <p>Invest in research and monitoring activities to identify the types and sources of marine litter -single choice reply-(optional)</p> | <p>5</p> |
| <p>Map existing relevant measures already being implemented and analyse gaps to be filled -single choice reply-(optional)</p> | <p>4</p> |
| <p>Establish action plans and/or targets for marine litter prevention and clean-up initiatives -single choice reply-(optional)</p> | <p>3</p> |
| <p>Implement awareness-raising campaigns on the sources and impacts of marine litter -single choice reply-(optional)</p> | <p>5</p> |
| <p>Develop initiatives to encourage/incentivise source separation -single choice reply-(optional)</p> | <p>5</p> |
| <p>Develop initiatives to encourage/incentivise consumption of tap water -single choice reply-(optional)</p> | <p>1</p> |
| <p>Install public water dispensers -single choice reply-(optional)</p> | <p>1</p> |
| <p>Introduce (seasonal) bans on plastic bags in coastal cities, and/or bans on plastic bottles during beach</p> | <p>1</p> |

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| events and concerts -single choice reply-(optional) | |
| Avoid plastic packaging in public procurement -single choice reply-(optional) | 1 |
| Organise clean-up events -single choice reply-(optional) | 4 |
| Ensure enforcement of existing public littering rules -single choice reply-(optional) | 5 |
| Ensure adequate availability of public litter bins -single choice reply-(optional) | 5 |
| Take action to ensure regulatory compliance of landfills and eradicate illegal dumpsites -single choice reply-(optional) | 5 |
| Cooperate with tourist sector, waste managers and retailers -single choice reply-(optional) | 5 |
| Exchange best practices with other municipalities -single choice reply-(optional) | 5 |
| Develop initiatives to promote the circular economy, diverting waste from landfill to recycling or energy recovery -single choice reply-(optional) | 5 |
| Cooperate in initiatives to promote fishermen as 'guardians of the sea', including monitoring and fishing for litter activities (collecting litter in large bags while fishing) -single choice reply-(optional) | 4 |
| Are there other actions which could be undertaken by local/sub-national authorities to reduce marine litter? If so, please list these actions: -open reply-(optional) | <p>On point 2.7.4: It is important that awareness raising campaigns focus not only on the sources and impacts of marine litter, but notably on the habits and attitudes of consumers. Consumers should be made further aware of the impact of their behavior on the environment and how they can minimize the negative impacts; the benefits of reuse and material / energy recovery, as well as the availability of waste management services and infrastructure and how best to use it.</p> <p>Implementing existing legislation and educating people to properly dispose of waste (sorting at home or using the available bins in the case of out-of home consumption) is the first step to set up a succesful policy to tackle litter. On point 2.7.11: This is very important and it is necessary to implement and enforce existing waste legislation before launching new regulatory initiatives. On point 2.7.14: It is also important for the authorities to closely cooperate with EPR systems for packaging waste. An additional recommendation is to promote the exchange of best practice with municipalities in neighbour countries and highly performing Member States.</p> |
| Which (if any) of the possible actions for local/sub-national authorities mentioned above are also of relevance for national authorities? -multiple choices reply-(optional) | <p>Invest in research and monitoring activities to identify the types and sources of marine litter - Organise clean-up events - Map existing relevant measures already being implemented and analyse gaps to be filled - Ensure enforcement of existing public littering rules - Ensure adequate availability of public litter bins -</p> |

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| | <p>Implement awareness-raising campaigns on the sources and impacts of marine litter - Take action to ensure regulatory compliance of landfills and eradicate illegal dumpsites - Develop initiatives to encourage/incentivise source separation - Cooperate with tourist sector, waste managers and retailers - Exchange best practices with other municipalities - Develop initiatives to promote the circular economy, diverting waste from landfill to recycling or energy recovery - Cooperate in initiatives to promote fishermen as 'guardians of the sea', including monitoring and fishing for litter activities (collecting litter in large bags while fishing)</p> |
| <p>Establish monitoring systems and environmental targets with a view to reducing litter inputs to the marine environment</p> <p>-single choice reply-(optional)</p> | 3 |
| <p>Share information, and develop knowledge-sharing platforms with authorities from neighbouring states, local authorities, NGOs and other stakeholders on amounts and sources of marine litter (particularly from monitoring in the framework of the Marine Strategy Framework Directive)</p> <p>-single choice reply-(optional)</p> | 5 |
| <p>Assist local authorities and NGOs in monitoring the effectiveness of measures aimed at combatting marine litter</p> <p>-single choice reply-(optional)</p> | 4 |
| <p>Provide guidance and resources to help local authorities select and implement measures to address marine litter</p> <p>-single choice reply-(optional)</p> | 4 |
| <p>Promote best practice and encourage NGOs, local authorities and other stakeholders to launch relevant initiatives to improve behaviour, prevent littering and support clean-up initiatives</p> <p>-single choice reply-(optional)</p> | 5 |
| <p>Support the development of Action Plans on marine litter within the framework of the four relevant Regional Seas Conventions (Barcelona, Bucharest, HELCOM and OSPAR)</p> <p>-single choice reply-(optional)</p> | 4 |
| <p>Are there other actions which could be undertaken by national authorities to reduce marine litter? If so, please list these actions:</p> <p>-open reply-(optional)</p> | |
| <p>Establish target(s) for marine litter reduction</p> <p>-single choice reply-(optional)</p> | 1 |
| <p>Support the actions of local and Member State</p> | 5 |

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| <p>authorities by funding research</p> <p>-single choice reply-(optional)</p> | |
| <p>Support the actions of local and Member State authorities by facilitating exchange of information, experience and best practice (e.g. hosting a database of published marine litter survey information, guidance on marine litter monitoring, common recording templates, expanded marine litter toolbox etc.)</p> <p>-single choice reply-(optional)</p> | 5 |
| <p>Facilitate coordination efforts across regional seas and support networking between authorities and other stakeholders</p> <p>-single choice reply-(optional)</p> | 4 |
| <p>Support development of Strategic Regional Action Plans on marine litter within the framework of the four relevant Regional Seas Conventions (Barcelona, Bucharest, HELCOM and OSPAR)</p> <p>-single choice reply-(optional)</p> | 5 |
| <p>Support international activities to combat marine litter (e.g. the Honolulu Strategy and marine debris reduction commitments in Rio+20)</p> <p>-single choice reply-(optional)</p> | 5 |
| <p>Establish a harmonised EU monitoring strategy for marine litter</p> <p>-single choice reply-(optional)</p> | 5 |
| <p>Extend and improve producer responsibility over the entire product lifecycle (e.g. optimisation of packaging and production including design for re-use, recycling, prevention, low material demand, etc.)</p> <p>-single choice reply-(optional)</p> | 5 |
| <p>Are there other actions which could be undertaken by EU policymakers to reduce marine litter? If so, please list these actions:</p> <p>-open reply-(optional)</p> | <p>It is important that policy makers ensure that there is a policy framework in place that promotes innovation and technology development by industry. EXPRA would also support additional efforts being taken to ensure that the Waste Hierarchy is implemented in EU Member States and that the current waste legislation in place is properly implemented.</p> |
| <p>Establish action plans and/or targets for marine litter prevention and clean-up initiatives</p> <p>-single choice reply-(optional)</p> | 1 |
| <p>Implement awareness-raising campaigns on the sources and impacts of marine litter</p> <p>-single choice reply-(optional)</p> | 3 |
| <p>Organise clean-up events</p> <p>-single choice reply-(optional)</p> | 4 |
| <p>Share information with local authorities and other stakeholders on the amounts and sources of marine litter (particularly from monitoring in the framework of</p> | 4 |

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| the Marine Strategy Framework Directive) -single choice reply-(optional) | |
| Assist local authorities in identifying target groups responsible for littering -single choice reply-(optional) | 3 |
| Launch relevant behavioural and preventive initiatives with other stakeholders -single choice reply-(optional) | 4 |
| Are there other actions which could be undertaken by NGOs to reduce marine litter? If so, please list these actions: -open reply-(optional) | |
| Promote the development of products and packaging which use less (plastic) material -single choice reply-(optional) | 3 |
| Promote the development of products and packaging made from innovative materials which are easier to re-use or recycle and which degrade less harmfully in the marine environment -single choice reply-(optional) | 3 |
| Extend and improve producer responsibility over the entire product lifecycle (e.g. optimisation of packaging and production including design for re-use, recycling, prevention, low material demand etc.) -single choice reply-(optional) | 4 |
| Exchange information, knowledge and best practices on innovative technologies, production processes and sustainable plastic packaging products -single choice reply-(optional) | 5 |
| Promote and finance initiatives aimed at increasing recycling of plastics -single choice reply-(optional) | 5 |
| Promote and finance marine litter initiatives -single choice reply-(optional) | 2 |
| Incorporate eco-labelling criteria in product design -single choice reply-(optional) | 3 |
| Are there other actions which could be undertaken by the plastics industry to reduce marine litter? If so, please list these actions: -open reply-(optional) | The plastic industry has been contributing with innovative solutions for a long time, for example by improving packaging optimisation, as this makes both environmental and economic sense. Nevertheless, improving environmental performance of products and packaging depends greatly on technological developments and requires a sound regulatory framework, fair market conditions and the collaboration of all stakeholders involved in the whole chain (including the phase of end -of-life). In this context it is also important to note that industry is making an important environmental contribution through the operation of EPR schemes, which contribute to collection and recycling of waste generated by products placed on the market. The sharing of best practices between EPR schemes should be further promoted. |

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| Motivate and inform customers on sustainable consumption -single choice reply-(optional) | 4 |
| Develop, promote and participate in separate collection and deposit refund systems for plastic bottles and bags -single choice reply-(optional) | 2 |
| Promote the use of reduced, reusable or recyclable packaging in products, both upstream (through purchasing/procurement decisions) and down-stream (through promotion of such products to consumers) -single choice reply-(optional) | 4 |
| Commit to targets for reduction of plastic packaging -single choice reply-(optional) | 1 |
| Exchange ideas and best practices with other retailers -single choice reply-(optional) | 5 |
| Are there other actions which could be undertaken by the retail sector to reduce marine litter? If so, please list these actions: -open reply-(optional) | |
| Sensitise tourists to the impacts of litter on the marine environment -single choice reply-(optional) | 5 |
| Provide eco-alternatives to plastic ashtrays and plastic cups on the beach -single choice reply-(optional) | 2 |
| Establish water dispensers in communal areas (e.g. hotel lobbies, beachfronts etc.) -single choice reply-(optional) | 2 |
| Participate in eco-tourism certification schemes -single choice reply-(optional) | 4 |
| Create and promote stewardship concepts such as adopt-a-beach -single choice reply-(optional) | 4 |
| Organise clean-up events -single choice reply-(optional) | 4 |
| Ensure adequate availability of litter bins -single choice reply-(optional) | 5 |
| Develop, promote and participate in separate collection and deposit refund systems for plastic bottles and bags -single choice reply-(optional) | 2 |
| Commit to targets for reduction of plastic packaging -single choice reply-(optional) | 1 |
| Exchange ideas and best practices | 5 |

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| -single choice reply-(optional) | |
| Are there other actions which could be undertaken by the tourism/recreational sector to reduce marine litter? If so, please list these actions: -open reply-(optional) | On point 2.20.8: These sectors should promote and implement separate collection of packaging, but not a specific deposit system for bottles. We would like again to strongly stress that these two approaches should not be mixed but evaluated and consulted separately. We strongly promote separate collection of ALL packaging and the respective awareness building of inhabitants and companies. We do not think that deposit systems deliver the same benefit for the environment as they concentrate only on a small part of the whole packaging with at the same time very high costs. |
| Inform, motivate and encourage citizens to improve source separation -single choice reply-(optional) | 5 |
| Organise training for professionals in waste operations -single choice reply-(optional) | 4 |
| Develop techniques for more efficient recycling of a wider range of waste streams -single choice reply-(optional) | 5 |
| Exchange ideas and best practices with other waste professionals, municipalities and other stakeholders -single choice reply-(optional) | 5 |
| Are there other actions which could be undertaken by the waste management sector to reduce marine litter? If so, please list these actions: -open reply-(optional) | Improvements could be made in waste transport, as light weight material / packaging such as plastic bags can fly off trucks and containers. This causes littering, which may end up in the sea. |
| Train crew members on waste regulation and practices on board ships -single choice reply-(optional) | 5 |
| Cooperate in initiatives to promote fisheries professionals as 'Guardians of the Sea', including monitoring and fishing for litter activities (collecting litter in large bags while fishing) -single choice reply-(optional) | 4 |
| Cooperate in special trips to collect litter form identified hot spots -single choice reply-(optional) | 3 |
| Retrieve abandoned or lost fishing gear -single choice reply-(optional) | 5 |
| Notify authorities about lost fishing gear -single choice reply-(optional) | 5 |
| Ensure adequate waste separation, minimisation and management on board ships, including adequate storage space for garbage -single choice reply-(optional) | 5 |
| Are there other actions which could be undertaken by the fisheries sector to reduce marine litter? If so, please list these actions: | |

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| -open reply-(optional) | |
| Train crew members on waste regulations and practices on board ships -single choice reply-(optional) | 5 |
| Cooperate in an efficient waste notification system -single choice reply-(optional) | 5 |
| Ensure that there are no disincentives for vessels to bring their litter ashore rather than dumping it at sea -single choice reply-(optional) | 5 |
| Ensure adequate waste separation, minimisation and management on board ships, including adequate storage space for garbage -single choice reply-(optional) | 5 |
| Are there other actions which could be undertaken by the shipping sector to reduce marine litter? If so, please list these actions: -open reply-(optional) | |
| Apply a waste fee system aimed at a maximum delivery of waste from ships -single choice reply-(optional) | 5 |
| Apply an efficient waste notification system -single choice reply-(optional) | 5 |
| Improve the waste handling system including procedures, conditions, management of fees, payment of operators, etc. -single choice reply-(optional) | 5 |
| Strengthen the inspection regime regarding waste delivery -single choice reply-(optional) | 5 |
| Consult port users on the adequacy of port waste reception facilities -single choice reply-(optional) | 5 |
| Provide clear and transparent information about the fee system in place -single choice reply-(optional) | 5 |
| Record and monitor the amounts of ships' waste delivered in ports -single choice reply-(optional) | 5 |
| Implement systematic exchange of information between enforcement authorities -single choice reply-(optional) | 5 |
| Ensure that ports have access to facilities for off-loading and correct disposal of hazardous waste -single choice reply-(optional) | 5 |
| Provide waste disposal bins and ensure that waste is not left in locations where it can be blown into the sea | 5 |

-single choice reply-(optional)

Are there other actions which could be undertaken by port authorities to reduce marine litter? If so, please list these actions:

-open reply-(optional)

If you have any additional comments, please provide them in the box below (max. 1000 characters).

-open reply-(optional)

-Sound and reliable data to quantify marine litter is crucial. EXPRA is skeptical of the possibility of setting a suitable target based on the information now available. -Implementation of waste legislation and education on waste disposal is a first step to tackle litter. Can be combined with e.g. fines for litter dropping, illegal waste dumping. -Flexibility for economic operators on instruments to use to improve environmental performance is key. Banning materials/products/packaging is discriminatory. -Difficult to set up one-size-fits-all measures. Further consider promoting initiatives at national/regional/local level, international cooperation. -Further consider input from fillers, EPR collection and recycling systems for packaging waste. Put emphasis on illegal/badly managed landfills.