

## Section 4.1: Stakeholder Engagement Questions

### Question 1

Do you believe the UK's current Port Waste Reception Regime is still adequate and effective?

- Yes, I agree
- No, I don't agree

Please provide further comments and evidence for your answer in the comment box below.

The Port Waste Reception Regime needs to be updated and undergo some revision. We would ask for a number of key revisions:

- no exemptions for vessels (e.g. fishing vessels)
- indirect fees
- ensure that more environmentally friendly practises are appropriately recognised and thereby encouraged
- incentivise the delivery of residues from tank washing containing high-viscosity persistent floating substances
- ensure enforcement of legislation with any penalties significant enough to deter recurrences
- separate collection of waste from ships in port to ensure that ship waste can become part of the circular economy
- ensure any passively collected waste (particularly during fishing) would be covered under the new indirect fee
- Does not adequately consider the needs of delivering MGN 363 (M+F) with respect to control of Invasive non-native species under the recently consulted Ballast Water Convention.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/440722/MGN\\_363.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440722/MGN_363.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1003522/BW - FAQ - GOV.UK.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1003522/BW_-_FAQ_-_GOV.UK.pdf)

UK not yet ratified, and intends to bring forwards own legislation. But possibly worth noting that most UK ports lack facilities to take ballast water if it is adopted.

- Consideration should also be given to Offshore platforms

### Question 2

Do you think that the current UK Port Waste Reception Regime offers robust environmental protection?

- Yes, I agree
- No, I don't agree

Please provide further comments and evidence for your answer in the comment box below.

The current UK Port Waste Reception Regime is not adequate. As highlighted in the EU Port Reception Facilities on their pre-2019 revision and which the existing current UK legislation is based upon that "discharges of waste at sea still occur at substantial environmental, social and economic costs. This is due to a combination of factors,

namely adequate port reception facilities not always being available in ports, enforcement often being insufficient and there being a lack of incentives to deliver the waste onshore.”

The Marine Conservation Society found an average of 601.3 pieces of litter per 100m on UK beaches (2015-2020 year-round data). It is often cited that 80% of litter comes from land, 20% comes from activities directly from littering to the sea. Evidence shows that 11.0% is fishing litter (2015-2020 data) indicating that improvements need to be made to reduce the amount of fishing gear lost at sea. Note this percentage is lower than that calculated by the EU because 45.7% litter found in the UK is non-sourced (meaning the item it can from can no longer be identified- therefore the figure from fishing is likely to be considerably higher). Where there is not the incentive to deliver waste onshore, there is increasingly probability of material being illegal and deliberately dumped at sea. Any passively fished waste collected in nets during fishing operations should be able to be delivered without charge.

### Question 3

Are there any problems with the UKs current Port Waste Reception Regime?

- Yes
- No

If Yes, please list any problems and why, providing evidence where possible.

Please see responses to question 1 and 2.

### Question 4

Are there any areas within the UKs current Port Waste Reception Regime which could be improved?

- Yes
- No

If Yes, please list any improvements and why, providing evidence where possible.

Environmental enforcement  
Ensuring green practises are encouraged and rewarded  
No exemptions based on vessel size

## Question 5

Has there been any unintentional impacts placed on operators/industry because of the UK's current Port Waste Reception Regime?

- Yes
- No

If Yes, please list any impacts and how they have occurred, providing evidence where possible.

Currently passively fished waste returned to port may incur a charge.

## Question 6

Do you think there are any best practices which could be taken from other international Port Waste Reception Facility regimes?

- Yes
- No
- Unknown

Please list any examples and add further details on why you have suggested these and detail what value they add in the comment box below.

EU Port Reception Facilities Directive should be seen as the minimum standard to achieve.

## Question 7

What other schemes, initiatives or incentives could the UK government look at to address marine litter as a societal waste?<sup>1</sup>

Please provide details of these below:

Extended Producer Responsibility (EPR) should be applied to Fishing gear. Fishers who have passively fished waste are potentially utilising storage on board, particularly for any large nets recovered. The fishers should be compensated for this recovery of waste from the ocean.  
There is currently no strategy or clear roadmap to reduce the amount of waste generated from fishing and aquaculture by UK governments. There is a need to focus on reducing the

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<sup>1</sup> Please note that your answer may be shared with relevant Government Departments, please see Paragraph 1.10 for further information.

amount of waste (and therefore litter) generated from these industries rather than just the, albeit welcome, collection of passively fished waste. We support the recommendations in the " Mapping Economic, Behavioural and Social Factors within the Plastic Value Chain that lead to Marine Litter in Scotland: Commercial Fishing Gear Report" and strongly support it being implemented throughout the UK.

<https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2020/02/mapping-economic-behavioural-social-factors-within-marine-plastic-value-chain-scotland/documents/commercial-fishing-gear/commercial-fishing-gear/govscot%3Adocument/commercial-fishing-gear.pdf>

1. Support education and engagement measures. Priority areas are engaging fishers on waste management options and the impacts of marine litter. Also advice on life cycle costs of more durable, repairable equipment to influence their procurement and design.
2. Evaluate feasibility and efficacy of EPR, recycling, and other waste management options a) Mandate reporting of products placed on market, and data on the collection and treatment of waste b). Understand current (baseline) waste management costs to fishers c). Evaluate EPR options for fishing gear d).Research recycling enablers and conduct cost-benefit analysis e).Gather industry views on 100% indirect fee, EPR and recycling measures in a combined consultation
3. Support best-practice and new technology

There are a number of schemes and initiatives to tackle the wider issue of single use plastic and other marine litter including bans, charges, deposits, taxes and Extended Producer Responsibility. We refer you to our consultation responses available on MCS website:

<https://www.mcsuk.org/ocean-emergency/ocean-pollution/publications/>

For single use plastics, the Directive on Single Use Plastics needs to be implemented by UK governments as a minimum.

## Question 8

Are there any types of ship generated waste that you/industry have difficulties discharging to Port Waste Reception Facilities?

Please list the waste types below and provide further details as to what would facilitate better landing of this/these waste type/types:

No comment

## Question 9

Please provide any further comments in regard to the UKs Port Waste Reception Facilities, please use the following comment box:

No additional comments

**Question 10**

Do you have any additional comments to add to the response?

**Please return completed response forms to [environment@mcga.gov.uk](mailto:environment@mcga.gov.uk)**

Alternatively, responses may be posted to:

Clean Ship Operations Team  
Maritime & Coastguard Agency  
Bay 2/23, Spring Place,  
105 Commercial Road,  
Southampton,  
SO15 1EG