EUROPEAN BOTTOM FISHERIES ALLIANCE

EBFA contribution to the call for evidence on Rules on single-use plastics and fishing gear

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General remarks

The European Bottom Fishing Alliance (EBFA) welcomes the European Commission's Call for evidence on the evaluation of the rules on single-use plastics and fishing gear. EBFA shares the objective of reducing marine litter and plastic pollution, which represent one of the most serious environmental challenges worldwide.

The scale of plastic pollution in the marine environment is alarming with million tonnes already present in the oceans and a projected annual input increase in the absence of effective interventions. A large share of this plastic does not remain at the surface but sinks and accumulate on the seabed, making the collection challenging.

Plastic pollution has well-documented impacts on marine life and habitat, causing entanglement, digestive complication, physiological stress and toxicological effects[1]. Fishers depend directly on healthy marine ecosystems for having a fruitful activity and sustain food production. Any degradation of marine biodiversity and habitats directly threatens the sustainability of fishing activities.

Plastic pollution also has a direct impact on fishers. Marine litter damages vessels and onboard equipment, reduces catch quality and quantity, increases maintenance and repair costs, and causes operational delays. These impacts translate into concrete economic losses for a sector that is already subject to significant regulatory and environmental pressures.

EBFA therefore fully agrees that marine plastic pollution must be addressed. However, it is essential that solutions are properly targeted, proportionate and scientifically sound. In this context, the evaluation should ensure that the fishing sector's contribution to marine litter is reassessed, that the significant efforts made by fishers to reduce their footprint are duly recognised, and that their involvement in marine depollution is supported through simplified procedures and properly rewarded.

1. Fishing gear proportion in marine litter

The Single-Use Plastics Directive focuses on the ten most commonly found single-use plastic items on European beaches - fishing gear isn't part of them[2]. Also, the Commission's guidelines on the reduction of the impact of certain plastic products on the environment indicates that fishing gear will not be covered in detail[3]. Nevertheless, on the assumption that fishing gear contributes significantly to marine litter, it is frequently targeted in broad communications and policy discussions on the matter.

[1] UNEP, 2021, From pollution to solution: a global assessment of marine litter and plastic pollution
[2] https://environment.ec.europa.eu/topics/plastics/single-use-plastics_en
[3] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.C_.2021.216.01.0001.01.ENG&toc=OJ%3AC%3A2021%3A216%3ATOC

To better understand this assumption, EBFA reviewed available information with a focus on two key aspects: first, what is comprised in "fishing gear", and second, the actual contribution of professional fishing gear to marine litter.

The Directive (EU) 2019/904 Article 3.4 defines fishing gear as "*any item or piece of equipment that is used in fishing or aquaculture to target, capture or rear marine biological resources or that is floating on the sea surface, and is deployed with the objective of attracting and capturing or of rearing such marine biological resources;*" and waste fishing gear as "*any substance or object which the holder discards or intends or is required to discard*". These definitions highlight the need to clarify whether this call for evidence, related policies and broader communications refer exclusively to fishing gear or also include aquaculture structures. This distinction is important, as it can significantly affect both the interpretation of data and the public perception of the fishing sector.

Attempts to quantify the contribution of EU professional fishing gear (excluding aquaculture) to marine litter has proven particularly challenging considering the variety of scales used to assess this indicator. Leading to the eventual use of global or non-EU figures in EU policy debates. EU fishers operate under strict regulatory frameworks and should not be penalised for fishing gear pollution originating from extra-EU activities. The review done by EBFA (see Annex) shows that existing estimates vary widely, ranging from 2.5% to 39% and allowed to identify several sources of bias that overestimate current figures:

- Association with other sectors such as:
    - Aquaculture related waste;
    - Recreational waste - Despite very different practices and regulatory frameworks, it might reveal challenging to distinguish recreational fishing waste from professional ones. A recent report highlights the potentially significant contribution of recreational fishing waste to overall fisheries-related waste[4]. However, while there are requests to report them separately, in practice, clearly distinguishing the two might be not feasible;
    - Sectors processing polystyrene. Some resources include polystyrene fragments as fishing gear (Figure 1)[5] ;

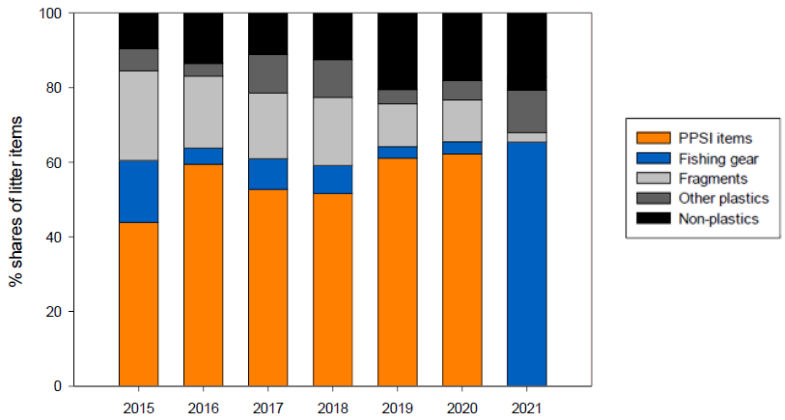

Figure 1. Annual share (%) of litter items attributed to PPSI (plastic packaging and small non-packaging plastic items), fishing gear, fragments, other plastics and non-plastic on European beaches, for the period 2015-2021

[4] Helcom, 2026, Lost angling gear in the Baltic Sea
[5] EEA, 2022, Marine Litter in Europe – An integrated assessment from source to sea

- Other maritime activities waste. Other long-standing or emerging maritime activities generating waste, such as shipping-items, inactive marine cables or offshore installations, are not counted.
- Other forms of pollution. Solid litter is often considered in isolation, while other pollution forms (liquid or gaseous) are excluded, which alters the relative weight attributed to fishing gear.

In addition, the unit of measurement matters greatly. Literature generally layout percentages without indicating the initial unit (weight or number). This can significantly affect results as the weight of a whole fishing net is far greater than a cigarette bud even though both may be counted as one unit. On the contrary, a fishing net that has been taken apart from natural erosion will count for a greater number.

In the end, the most recent resource at EU level indicates that fishing gear contribution to marine litter is 2,5% (figure 2)[6] which is far less than the actual figure used.

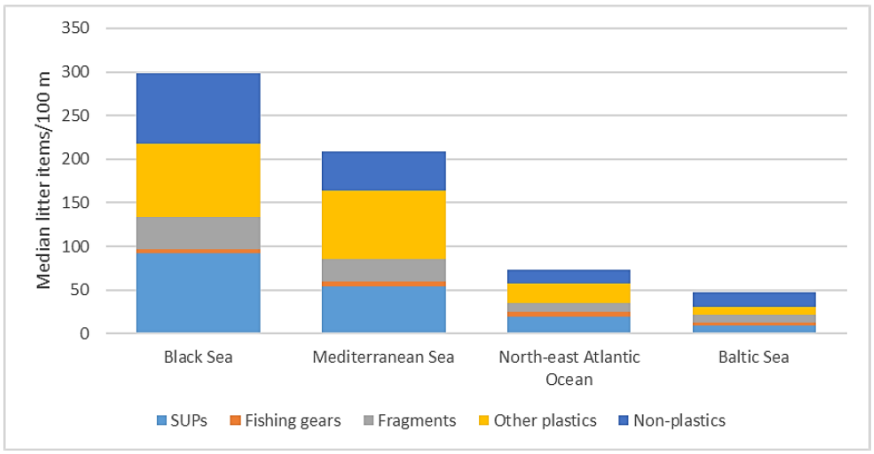

Figure 2. Median number of Single-use plastics (SUP), fishing gear, fragments (2.5 to 50cm and > 50cm plastic and polystyrene pieces combined), other plastics and non-plastic litter items found on the regional seas' beaches for the period 2013-2022

It should also be recalled that fishers always attempt to retrieve lost fishing gear in compliance with the EU Fisheries Control Regulation. In this regard, they are required to carry on board the equipment necessary to retrieve lost gear.

Finally, the intention behind pollution must be considered. For fishers, fishing gear replacement represents a significant investment in terms of time, energy and financial resources. However, in certain circumstances, abandonment may be unavoidable for safety or regulatory reasons, such as encounters with subsea cables.

Considering the above, revised and robust figures are needed. In this respect, the Directive (EU) 2019/904 and the Decision (EU) 2021/958, which establish monitoring and reporting obligations for fishing gear placed on the market and waste fishing gear collected, could be key instruments to build a clearer and evidence-based picture if properly used. In addition, under the new Fisheries Control Regulation, where fishing gear is lost at sea, the fishing logbook must also include the following information:

[6] EEA, 2024, Marine Litter Watch – europe's beach litter assessment

(a) the type and approximate dimensions of the lost gear;
(b) the date and estimated time of the loss;
(c) the position where the gear was lost;
(d) the measures taken to retrieve the lost gear.

2. Fishers' efforts to reduce their contribution to marine litter

As previously explained, fishers have a direct interest in healthy ecosystems and low level of marine pollution, hence their strong incentive to reduce their own contribution to marine litter. Especially for those using passive gear, considering the greater risk of gear loss[7].

The fishing sector has been actively engaged in preventive and corrective measures. It is also involved in innovation and transition efforts, including the development of alternative materials, improved gear design, and circular approaches to fishing gear waste management. As way of example, Europêche was involved in the development of new European standards for the circular design of fishing gear and aquaculture equipment[8]. These initiatives demonstrate the willingness of fishers to be part of the solution, provided that measures are technically feasible, economically viable and properly supported. Indeed, the number of restrictions imposed on specific materials use is increasing (e.g. dolly ropes, EPS buoys, lead, etc.), often without proper consideration of whether viable alternatives exist. And, where alternatives are available, insufficient attention is given to their practicality or to the significant additional costs that switching to these materials would entail.

Regional frameworks such as the OSPAR Regional Action Plan on Marine Litter include concrete actions to prevent, locate, retrieve and manage abandoned, lost or discarded fishing gear. For example :

- Action 36 develop and promote best practice in relation to marine litter (waste management on board, waste management at harbours and operational losses/net cuttings);
- Action 37 investigate the prevalence and impact of dolly rope and engage with the fishing industry in order to reduce the corresponding waste generated;
- Action 56 aim to identify hot spot areas through mapping of snagging sites or historic dumping grounds;
- Action 57 develop a risk assessment for identifying where accumulations of ghost nets pose a threat to the environment and should be removed;
- Project Seacular[9] will develop and test four sustainable and circular solutions (dolly ropes made from recycled fishing gear, incorporation of certified marine-biodegradable materials for demersal seine ropes, design of eco-designed biodegradable drifting fish aggregating devices, development of an innovative end-of-life fishing gear management system in ports);
- Project NETTAG+[10] will develop three innovative and sustainable solutions to mitigate the adverse impacts of fishing gear on marine life and habitats;
- Project Free LitterAT[11] will combine knowledge, tools and technology with pilot actions to prevent and reduce marine litter with special emphasis on Abandoned, Lost or otherwise Discarded Fishing Gear and microplastics.

[7] Richardson et al., 2022, Global estimates of fishing gear lost to the ocean each year
[8] https://www.cencenelec.eu/news-events/news/2025/eninthespotlight/2025-01-16-en-17988-fishing-gear/
[9] https://cordis.europa.eu/project/id/101112852
[10] https://cordis.europa.eu/project/id/101112812
[11] https://freelitterat.eu/

In this context, it is important to underline that fishing gear is expensive and complex to recycle. Fishing gear is often composed of multiple materials and requires dismantling, cleaning and sorting before entering recycling streams. Recycling facilities remain limited in number and capacity, and the associated costs are significant. Any policy approach must therefore take into account the economic and logistical constraints linked to fishing gear recycling and ensure that adequate support mechanisms are in place.

3. Fishers' efforts to reduce others' contribution to marine litter

Fishing activities inevitably result in the collection of litter originating from other sectors. Active bottom fishing in particular play a crucial role when it comes to the seafloor pollution by removing marine litter every time their gear crosses paths with it. Every day, fishers bring ashore waste that they did not generate themselves and this contribution to depollution is often overlooked.

Specific initiatives such as "Fishing for Litter" and "gravity wave" illustrate this role. Thanks to Fishing for Litter, fishers have already collected more than 13 million kilograms of marine litter[12]. With Gravity wave, 7 000 fishers removed nearly 1 179 995 kg of plastic[13]. And this figure does not include the substantial quantities of waste collected daily outside formal frameworks.

EBFA stresses the need for proper recognition of the role of fisheries in marine depollution. Fishers are not only engaged in reducing their own contribution to marine litter but are also active in reducing everyone else's.

4. Port and reception facilities directive

To address marine litter and compensate for fisheries part in it, fishers must comply with the Port Reception Facilities Directive. This framework requires, among other obligations, advance waste notification, onboard management of waste, delivery of waste to ports with adequate reception facilities (which may not be their usual landing port), completion of complex forms and payment of an indirect fee to ensure the availability of these services.

While EBFA supports the objective of ensuring adequate waste reception and treatment, fairness concerns must be highlighted. All vessels are required to pay indirect fees regardless of their individual contribution to marine litter, and the fishing vessels that devote time and resources to collecting and managing litter are not necessarily those responsible for its origin. Furthermore, Member States do not implement the indirect fee in a harmonised manner. In some cases, the cost is borne by port users, while in others it is imposed on fishing gear providers, resulting in a significant increase in gear prices (e.g. a 10% increase in Denmark).

EBFA considers this approach counterproductive, as it may incentivise fishers to purchase gear outside the EU. This not only undermines the competitiveness of EU gear manufacturers but also complicates efforts to improve traceability and advance the objectives of the EU circular economy.

[12] https://fishingforlitter.org/
[13] https://www.thegravitywave.com/en/

Also, if revised figures of professional fishing gear contribution to marine litter reveals to be substantially lower, the associated administrative burden and costs from this Directive should be reconsidered and, where appropriate, removed.

In light of these elements and considering the Commission's obligation to evaluate the Port Reception Facilities Directive by 28 June 2026, EBFA calls for a thorough review. This is particularly important given that Directive (EU) 2019/904 (recital 23) itself acknowledges that the previous regulatory framework did not provide sufficient incentives for a reduction in the proportion of fishing gear in marine litter. The review should consider whether strengthened standards under the new fisheries control regulation, the introduction of the indirect fee system and supplementing financial incentives have contributed to ameliorate the situation.

Instead of being penalized, EBFA calls for fishers to be properly encouraged and rewarded for their role in collecting litter. Managing waste on board requires time, energy, complicates compliance with sanitary rules, reduces available storage capacity so can affect the volume of catch that can be carried and costs. Administrative burdens should therefore be reduced as much as possible, and incentive-based approaches should recognise fishers as key partners in marine depollution rather than treating them primarily as polluters.

5. Impact of marine litter on seafood

Seafood is widely recognised as a healthy and nutritionally valuable food source, providing essential proteins, vitamins and fatty acids that contribute positively to human health[14].
In recent years, a growing number of studies focusing on micro- and nanoplastics presence in seafood have contributed to a perception that it represents a significant exposure pathway. While they can indeed be detected in seafood, scientific evidence indicates that their contribution to overall human exposure is minor compared to other everyday sources such as air and drinking water[15]. Furthermore, no proven direct risk to human health from the ingestion of micro- or nanoplastics has been demonstrated to date[16].

The concern that plastic marine litter may affect human health shouldn't be linked to the minimal presence of micro- and nanoplastics currently observed in seafood but to physical hazards and to the potential presence of toxic substances associated with plastic materials.

To avoid undermining consumer confidence in seafood products, EBFA calls for responsible, science-based communication that clearly distinguishes demonstrated risks to human health from generalized vague assumptions.

6. Conclusion

EBFA supports the European Union's objective of reducing marine litter and plastic pollution, but stresses the need for a balanced, proportionate and evidence-based approach that recognises the specificities of the fishing sector, avoids unnecessary administrative and economic burdens and properly reward depollution contributors.

[14] https://fishcoalition.org/fr/news-resources/resources/icfa-seafood-nutrition-toolkit/
[15] Henry et al, 2025, Examining Misconceptions about Plastic-Particle Exposure from Ingestion of Seafood and Risk to Human Health
[16] https://www.europarl.europa.eu/doceo/document/E-10-2026-000382_EN.html

Available data indicate that the contribution of EU fisheries to marine litter is lower than often assumed, while fishers already operate under strict regulatory obligations and make significant efforts to prevent gear loss and to remove litter from the marine environment. EBFA encourages the European Commission to rely on robust, transparent data and statistics that accurately reflect the sector's actual contribution, without artificially inflating its impact.

Future policy development and evaluations, including that of the Port Reception Facilities Directive, should therefore recognise fishers as key partners in marine depollution rather than treating them primarily as polluters. Administrative burdens and waste management fees should be reduced where not justified by robust evidence, and incentive-based approaches should reward good practices, innovation and circular solutions.

EBFA calls for the introduction of dedicated financial incentives to support fishers' voluntary participation in litter collection at sea, including through initiatives such as *Fishing for Litter* and *Gravity wave*. Financial support mechanisms—whether through EU funds, national schemes or port-based compensation systems—are essential to increase efforts and encourage broader participation by the fishing sector.

On a global scale, considering that 88–95% of the global plastic load entering the seas comes from ten rivers, eight in Asia and two in Africa[17], and bearing in mind that at international level only exist 'Voluntary Guidelines for the Marking of Fishing Gear,'[18] EBFA urges European institutions to address the issue through ocean diplomacy in the ongoing plastics Treaty negotiations by using the momentum of the recent chair election[19].

[17] Schmidt et al, 2017,.Export of Plastic Debris by Rivers into the Sea
[18] https://www.fao.org/responsible-fishing/marking-of-fishing-gear/voluntary-guidelines-marking-fishing-gear/en/
[19] https://www.ciel.org/news/inc-5-3-reaction/

ANNEX. Review of the percentage of fishing gear contribution to marine litter

%	sector contributing to marine litter	scale	source
2,5%	Fishing gear	EU	EEA, 2024, Marine Litter Watch – europe's beach litter assessment
2,4<x<7%	Fishing gear	EU	European Commission, 2018, reducing marine litter: action on single use plastics and fishing gear
10%	lost or discarded fishing gear	Global	UNEP, 2021, From pollution to solution: a global assessment of marine litter and plastic pollution
17%	fisheries and aquaculture industries	Northeast Atlantic region	Grimaldo et al, 2023, Reducing plastic pollution caused by demersal fisheries
<20%	Sea-based litter	EU	EEA, 2023, From source to sea – the untold story of marine litter
<20%	ocean-based sources (including fisheries)	Global	McKinsey, 2015, stemming the tide land-based strategies for a plastic free ocean
21,6 %	Fishing gear	EU	Directive (EU) 2019/904 on reducing the impact of certain plastic products on the environment
27%	Plastic fishing gear	EU	European Commission, 2018, Reducing Marine Litter: Action on single use plastics and fishing gear
34%	Fishing lines and nets	NEA and Mediterranean Sea, depths between 35 and 4,500m	Pham et al., 2014, Marine Litter distribution and density in European Seas, from the shelves to deep basins
39%	Fisheries-related litter	UN	UNEP, 2021, From pollution to solution: a global assessment of marine litter and plastic pollution