



Ms Charlina Vitcheva
Director-General
Directorate-General for Maritime Affairs and Fisheries
European Commission
1049 Brussel
Belgium

Dun Laoghaire, 04 August 2020

Dear Ms Vitcheva,

Subject: NWWAC response to Commission consultation on harmonized standards for circular design of fishing gear

The North Western Waters Advisory Council (NWWAC) hereby submits its response to the Commission's consultation on the proposal for harmonized standards for circular design of fishing gear from 24 July. Both documents are attached separately with comments inserted and track changes on.

We understand that this draft is also based on the outcome of several consultation levels with relevant stakeholders performed during the study carried out by MRAG in which the NWWAC participated.

We would like to call your attention to the results and recommendations from the two related workshops the NWWAC hosted in collaboration with other Advisory Councils, namely the workshop on Marine Plastics in the Seafood Supply Chain ([link](#)) and the workshop on Fishing Gear in a Circular Economy ([link](#)).

On 15 July 2020 the NWWAC submitted its Advice on the Implementation of the SUP Directive and operational matters of the Fishing for Litter Scheme with the endorsement of seven other ACs ([link](#)). In this advice, specific mention was made regarding the requirements under Article 8(9) of Directive (EU) 2019/904, as well as other relevant articles, including but not limited to:

- Explore the suitability of extended producer responsibility scheme and modulated fees in the complex industry where the majority of fishing gear is repaired regularly over decades before it reaches the end of its life.
- Financial incentives to explore eco-design, design for disassembly, reduction of number of polymers used in fishing nets, for example via pilot projects supported by public sector R&D funding.
- Investigate ways of identifying or labelling different materials such as polymers, so as to ease identification for recycling





- Carry out further consultation with gear manufacturers to investigate the possibility of developing measures to extend the life of fishing gear by using more durable material but also easier to recycle at its end of life. It is worth underlining that due to the harsh conditions at sea in the fishing process, the nets and ropes are already very durable and are long-lasting.
- Taking into account the waste hierarchy and following the EU Waste Framework Directive, the aim is to design a gear that uses the least resources and has most longevity while maintaining the same fishing properties and efficiency for professionals, but also to create a design most suitable for recycling, ensuring easy stripping of the material.
- Following the SUP and PRF Directives, recycling of fishing gear as a multi-material product should encompass all parts and materials of the gear, including metals and/or other materials. Solutions must be investigated and established for all materials.
- Carry out a life cycle analysis of current fishing gear and use it as a unit of measure in the development of new gear technologies. In order to move to more circularity, investments must be made in the development of single material nets based on existing and new materials.

NWWAC members appreciate that the Commission proposal overall is in line with recommendations made by the ACs, and that any such standard will provide a level playing field for organisations to design and develop higher quality and lower environmental impact fishing gear that is easily reused or recycled at the end of life and will provide organizations the opportunity to act sustainably for a healthier planet.

However, the need for further investigation into life cycle analyses for various gear types and the financial incentivization for research into eco-design as well as pilot products must be addressed by the Commission.

Finally, it is essential that any standard will be voluntary for the organisations considering that in some Member States work is currently underway on the preparation of national standards.

Best regards,

Emiel Brouckaert

Chairman Executive Committee

