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This document has been revised to include the replies to the questionnaire as provided by Denmark, Germany and Russia.

Background

A regional questionnaire to compile information on national activities with regard to abandoned, lost or otherwise discarded fishing gear (ALDFG) was jointly elaborated by HELCOM EN-Marine Litter and FISH group to advance regional work on the issue launched by decisions of PRESSURE 7-2017 ([Outcome of PRESSURE 7-2017](#), para. 3.15-3.18) and FISH 7-2017 ([Outcome of FISH 7-2017](#), para. 7.1-7.3).

In accordance with the decisions by PRESSURE 8-2018 ([Outcome of PRESSURE 8-2018](#), para. 3.13-3.16) and FISH 8-2018 ([Outcome of FISH 8-2018](#), para. 7.1-7.8) PRESSURE and FISH contacts were invited on 14 June 2018 to provide their feedback by 7 September.

The questionnaire has been replied by Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland, Russia and Sweden.

This documents contains an overview of the results of the questionnaire to serve the discussion on further regional actions on ALDFG by the Meeting. This document will also be submitted to the next FISH meeting for consideration.

Action requested

The Meeting is invited to:

- consider the outcome of the questionnaire;
- evaluate the scope and scale of the problem revealed by the questionnaire; and
- based on that discuss and agree on potential regional actions to mitigate the impact of ALFG on the marine environment.

Outcome of the regional questionnaire to compile information on national activities with regard to ALDFG

HELCOM initiated this questionnaire to collect information on recent, on-going and planned national activities with regard to abandoned, lost or otherwise discarded fishing gear (ALDFG) both from commercial and recreational activities and how they can be possibly developed to a regional approach. The questionnaire would also compile information on national views and commitments and if exist, legal frameworks. For the purpose of this questionnaire 'fishing gear' referred to complete gear and parts thereof.

Based on the reporting and resulting evaluations, the intention is to understand the extent of the problem, identify existing (regulatory and/or scientific) gaps and evaluate the opportunities and challenges of a harmonized regional approach on ALDFG and possible alternative approaches to address the problem in the Baltic Sea region.

Questions were to be responded from the national perspective. Information on projects that might be relevant to the questionnaire was also requested.

The questionnaire has been replied by Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland, Russia and Sweden. Below their responses are gathered and analysed aiming to summarise the current status in the Baltic Sea and initial ideas for further action on the issue of ALDFG.

Summary of the current status of the approach on ALDFG in the Baltic Sea and initial ideas for further action

The national legal framework to address ALDFG management is mainly driven by the obligations steamed from EU regulations, which have been transposed to national law:

- [Directive 2000/59/EC](#) of the European Parliament and of the Council of 27 November 2000 on **port reception facilities** for ship-generated waste and cargo residues: which establishes an obligation to provide port waste reception facilities (PRF), which must be adequate to meet the needs of ships using the port, without causing undue delay. It also requires the delivery of ship generated wastes and the implementation of a cost recovery system by the Member States covering the costs of planning for, collecting and disposal of this waste.
- [Council Regulation \(EC\) No 1224/2009](#) of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No 847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006: **Art. 48 is dedicated to the retrieval of fishing gear**. The master of the fishing vessel that has lost gear or part of it shall attempt to retrieve it as soon as possible and if it cannot be retrieved he has to inform the competent authority of its flag Member State, which shall then inform the competent authority of the coastal Member State, within 24 hours of specific information on the issue. If the gear that is retrieved by the competent authorities of the Member States has not been reported as lost, these authorities may recover the cost from the master of the fishing vessel that lost the gear. A Member State may exempt Community fishing vessels of less than 12 metres' length overall flying its flag from the requirement of retrieving the list gear if they: (a) operate exclusively within the territorial seas of the flag Member State; or (b) never spend more than 24 hours at sea from the time of departure to the return to port.
- [Commission Implementing Regulation \(EU\) No 404/2011](#) of 8 April 2011 laying down detailed rules for the implementation of Council Regulation (EC) No 1224/2009 establishing a Community control system for ensuring compliance with the rules of the Common Fisheries Policy: where **Chapter III** is dedicated to **marking and identification of EU fishing vessels and their gear**. It is to point out that the number of infringements of Art. 48 of the EC 1224/2009 are to be reported every 5 years.

- [Regulation \(EU\) No 1380/2013](#) of the European Parliament and of the Council of 11 December 2013 on the **Common Fisheries Policy**, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC: which provides the overall framework on fisheries at EU level.

One country has an additional national regulation which addresses the management of the ALDFG once recovered from the sea: marked gear is transferred to the owner if identified; whereas unmarked but suitable for further use gear is intended for sale and auctioned. All the remaining equipment is stored in the harbour areas. **This approach enables closing the loop and may be relevant for further consideration at a regional level.**

In another country it is prohibited to import fishing nets into the national territory from synthetic materials and electric pulse fishing systems. **This also may be considered for implementation at regional level.**

It is also to point out the application of the no-special-fee system to ship-generated wastes and marine litter caught in fishing nets in the Baltic Sea area as contained in [HELCOM Recommendation 28E/10](#) was mentioned only by two countries. **Thus, the question may arise whether there might be a need to further work on the follow up on the implementation of the Recommendation.**

In terms of data available, there is a scarce knowledge of the amount of annually LFG in national waters in all countries participating in the questionnaire except Denmark and in Germany (only for 2016). This seems to be mainly due to the lack of an appropriate reporting system (in some cases there is data, but the reporting system is not properly established and this information is not included in the logbooks). **There seems to be room for improvement on the LFG data reporting system.**

Findings from the MARELITT Baltic project reflect on the fishermen perspective (59 from Estonia, 70 from Poland and 31 from Sweden) of the amounts and reasons for gear loss in the Baltic (see tables below).

| Reason | Estonia* | | Poland* | | Sweden* | |
|---|----------|---------|---------|---------|---------|---------|
| | Past | Present | Past | Present | Past | Present |
| Sea bed objects (rocks, "hooks" etc.) | - | 29 | 47 | 40 | 21 | 21 |
| Ship wrecks | - | 9 | 24 | 23 | 16 | 19 |
| Conflicts (with fishermen, non-fishing vessels) | - | 26 | 19 | 27 | 40 | 43 |
| Environment (strong current) | - | 0 | 9 | 10 | 14 | 12 |
| Environment (wind/waves) | - | 14 | 0 | 0 | 0 | 0 |
| Environment (ice) | - | 23 | 0 | 0 | 0 | 0 |
| Other reason (theft, sabotage) | - | - | - | - | 9 | 5 |

(*Given in % of provided answers).

| | Fishing gears are lost less than ones/year | Fishing gears are lost ones/year | Fishing gears are lost ones/month | Fishing gears are never lost |
|---------|--|----------------------------------|-----------------------------------|------------------------------|
| Estonia | 4 | - | 1 | 18 |
| Poland | 22 | 30 | 12 | - |
| Sweden | 4 | 2 | - | - |

Source: [MARELITT Baltic](#).

There is also some data available on the amount of annually recovered LFG for two out of the nine countries replying the questionnaire (see Table below). In addition, one country also indicated that certain amounts are retrieved by operations of diving associations /scientific institutes and through Fishing-For-Litter activities. Also one country indicated that there is available data for occasionally detected fishing gear. **Thus, there seems to be a need of gathering more data on the amount of fishing gear lost and recovered in most of HELCOM countries. There are high expectations on the results of the MARELITT Baltic project.**

| Years | Poland | | | | | | | Sweden | | |
|-----------|----------------|-----------------|--------------------------|---|-------------------|---------------|------------|------------------|---|------------------|
| | Gillnets | Trawl nets (kg) | Not identified nets (kg) | Cables, steel ropes, parts of fishing equipment (but not FG) (kg) | Fyke nets (units) | Longlines (m) | Fish traps | Fishing yarn (m) | Sport fishing equipment in the form of han lines for cod fishing (unit) | Eel traps (unit) |
| 2000-2006 | | | | | | | | 47 123 | | |
| 2007-2013 | | | | | | | | 44 540 | 465 | 123 |
| 2015 | 268 tonnes | | | | | | | | | |
| 2016 | | | 4250 m + 1860 kg** | | 3** | | | 17 061 | | |
| 2017 | 271 kg* 0** | 387* | 7* 2730 m + 1860 kg** | 2372* | 3** | 0** | 3** | 33 776 | | |
| 2018 | 460 m** | | 4250 m + 1860 kg** | | 27** | 1250** | 2** | | | |

*Preliminary results from MARELITT Baltic. Final results will be published in March 2019 on the [website](#), which will include data from Estonia, Poland and Sweden.

**Data collected from the Directors of the Maritime Offices in Poland.

A survey conducted in 50 Baltic fishing harbours¹ on the adequacy of ports to receive, separately collect and sort the derelict fishing gear collected from the sea as well as end-of-life fishing gear indicates that:

- more than half of the harbours surveyed organised waste management services at a reasonably good level;
- fishing harbours in Germany and Poland have somewhat better general ability to organise waste management than those in Sweden² and Estonia;
- almost half of the harbours do not have enough containers suitable for the separate collection of waste;
- FG is not separately collected in almost half of the fishing harbours but placed in the same container as other municipal waste;
- in most cases, the harbour personnel is unaware of what happens next to separately collected FG;
- there are deficiencies in the provision of information to the harbour users, i.e. fishermen do not always know where and when end-of-life FG must be collected;
- no attention has been given to ICT opportunities for introducing the waste management rules and organisation of work at harbours (e.g. the harbour's website does not provide enough information).

All these bullet points, which are aligned with the information reported by countries replying the questionnaire, may serve as inspiration to improve the collection and sorting of FG at ports. Also, the experience in Germany where end-of-life fishing gear collection is organised and financed by some fisheries associations as well as the establishment of fishing-for-litter schemes in some ports can serve as inspiration.

In terms of what happens with the FG after its collection, there is preliminary information from MARELITT Baltic on the **testing of diverse recycling methods for retrieved fishing gear**³. The final report is envisaged in March 2019. This information is to be considered in conjunction with the Danish⁴ and Swedish experience on the matter⁵, as well as German on-going considerations on the possibilities to establish EPR schemes. Finally, it is to be noted that in those occasions when recycling is not possible and thus FG is considered as waste, the existence of a specific waste code for ALDFG and/or sea-born plastics was indicated by one country as a possibility to improve its management.

There is knowledge available on best practices to reduce the amount of ALDFG, which may be analysed and further elaborated to implement action RS7 of the RAP on ML, on the development of guidelines on best practices to reduce the input of ALDFG from commercial and recreational fishing to the Baltic Sea:

- as part of the MARELITT Baltic work on [responsible fisheries prevention scheme \(WP3\)](#), an action plan to reduce gear loss is envisaged by March 2019;
- as a one of the results of the MARE foundation project: "[Conservation and restoration of marine biodiversity and ecosystems in the framework of sustainable fishing operations, consisting of retrieval of derelict fishing gear and marine litter – Clean Baltic](#)" (2017), there was a list of recommendations in order to reduce the amount of ALDFG coming from commercial fishing;
- [FAO voluntary guidelines for the marking of fishing gear](#) adopted in July 2018.

In relation to the promotion of best practices on removal of ALDFG it is to point out the active role by the Polish authorities to share available material with fishing vessels' owners as well as those involved in recreational fisheries⁶. Also in Denmark there are plans to do so in 2019. In Germany, there are no official

¹ See [MARELITT Baltic, 2017. Survey on Harbour Reception Facilities at selected Baltic Sea fishing harbours](#).

² Please note that the survey does not cover the West coast of Sweden.

³ See [MARELITT Baltic, 2018. Recycling options for \(lost\) fishing gear](#).

⁴ See [Plastix](#) a Danish company that produces recycled raw materials (plastic pellets) based on post use input streams collected from the maritime industry.

⁵ See [FF Norden](#) that works closely with the Swedish municipality Sotenäs.

⁶ See: http://www.wwfpl.panda.org/co_robimy/morza_oceany_glowna/ghost_fishing/rezultaty/

recommendations so far, however, retrievals are often carried out in consultation with the nature protection authorities⁷. Additional available knowledge on the matter:

- [Environmental Impact Assessment - Retrieval of derelict fishing gear from the Baltic Sea](#), a report conducted in the frame of the MARELITT Baltic;
- experience from capacity building meetings set within the MARELITT Baltic project in Estonia, Germany, Poland and Sweden;
- the MARE foundation project: “[Conservation and restoration of marine biodiversity and ecosystems in the framework of sustainable fishing operations, consisting of retrieval of derelict fishing gear and marine litter – Clean Baltic](#)” (2017), consisted of many actions at promoting of best practises on ALDFG as well as retrieving LFG;
- results of the Finnish pilot study of ALDFG in the Finnish Coastal waters (Bothnian Sea and Archipelago Sea) initiated in March 2018 to identify and map the possible areas of ALDFG, remove the identified gears together with local fishermen, store and handle the removed FG and tackles and test recycling possibilities.

Thus, there seems to be enough information to initiate the drafting process of the development of a report on best practices in relation to ALDFG and derelict fishing gear and their removal in fulfilment of action RS 6 of the RAP on ML.

When asked about the existence of any extended producer responsibility (EPS) scheme established for FG, countries indicated that there is currently none established (the EU Control Regulation 1224/2009, Art. 48, contains general EPR provisions for products, but no special provisions for fishing gear). However, there are plans to do so linked to the [proposal for the European Directive on the reduction of the impact of certain plastic products on the environment](#) which is the first instrument steamed from the European Strategy for Plastics in a Circular Economy adopted on 16th January 2018 ([Strategy](#) and [Annexes](#)). The proposal, among other issues, tackles fishing gear containing plastic establishing measures on:

- EPS (Art. 8): producers shall cover the costs of the collection of waste FG containing plastic that has been delivered to adequate PRFs and its subsequent transport and treatment. The producers shall also cover the costs of the awareness-raising measures regarding FG containing plastic (Art. 10); and
- awareness raising (Art. 10): consumers are to be informed on: (i) the available re-use systems and waste management options as well as best practices in sound waste management carried out in accordance with Article 13 of Directive 2008/98/EC; and (ii) the impact of littering and other inappropriate waste disposal of FG containing plastic on the environment, and in particular on the marine environment.

Thus, it is important to follow up this EU process as well as the on-going process on the [revision of the EU PRFs Directive](#), together with experiences in Iceland⁸ and [Norway](#) on the topic that may contribute to advance on this issue in the region.

Sites where ALDFG accumulates are being identified and mapped in those areas covered by the MARELITT Baltic project (final report to be available in March 2019) as well as in Lithuania, whereas a project is planned for that purpose in Denmark in 2019. **Additional effort seems to be needed in this regard to further advance on the mapping of snagging sites or historic dumping grounds and a risk assessment for identifying where accumulation of ghost nets pose a threat to the environment and should be removed as required by action RS10 in the RAP ML.** Collaboration with fishermen and divers as well as digital tools like the one under

⁷ See <https://www.nabu.de/natur-und-landschaft/aktionen-und-projekte/meere-ohne-plastik/fishing-for-litter/index.html>

⁸ In Iceland, there is a voluntary agreement where fishermen can deliver nets and dolly ropes to waste receptions facilities free of charge. The voluntary agreement between the fishermen and the Icelandic Recycling Fund (a state-owned agency) aims to recover and recycle fishing nets made from plastic (OSPAR, 2017. [A Review of Marine Litter Management Practices for the Fishing Industry in the North-East Atlantic Area](#)).

development in Sweden, the “GhostGuard” for recreational fishermen to report where they have lost their gear, may serve this purpose.

The reasons why ALDFG accumulates in those specific sites have only been partly identified in one country answering the questionnaire who indicated that wrecks and other underwater obstacles are the most prominent accumulation sites (before GPS losses), and that losses today are dominated by boat accidents and unexpected weather change. Thus the focus for search activities are gillnet areas inside the 3-mile coastal zone. In addition, one country is investigating the role of wrecks and another one is planning a project in 2019 to investigate the issue.

Finally, in terms of removal of ghost nets where they have been identified as posing a threat to the environment it has been conducted in connection with: (i) wrecks (when they are being sanitized); (ii) hot spots identified by fishermen and divers (as part of the MARELITT Baltic project); and (iii) in coastal areas of high nature value, including Natura 2000 sites (within the Clean Baltic project).

As it can be expected there is further work needed to advance on this action which may only be possible to conduct once hot spots are identified.

Replies provided by HELCOM countries

What legal frameworks (legal acts, guidelines, other regulations and communications, including any applicable EU and international legislation) for ALDFG management exist in your country?

| Country | Legal framework |
|---------|---|
| Denmark | (EC) No 1224/2009 (EU) No 404/2011 |
| Estonia | Waste Act: https://www.riigiteataja.ee/akt/104072017043?leiaKehtiv Fishing act: https://www.riigiteataja.ee/akt/109112017003?leiaKehtiv Port reception facilities directive (2000/59/EU), Port Act: https://www.riigiteataja.ee/akt/13196603?leiaKehtiv |
| Finland | None |
| Germany | <ul style="list-style-type: none"> • EU Control Regulation 1224/2009 (with Enforcement Regulation 404/2011): Article 48 requires equipment on fishing vessels to retrieve fishing gear when lost; in case this is not possible, the captain has to report against the federal and Länder agencies in charge. Although reporting is legally binding it is not adequately enforced and therefore hardly ever happens. Marking requirements summary: www.lallf.de/fileadmin/media/PDF/fischer/Vortrag_BiFi2012_Kennzeichnung_Fanggeraete.pdf • Fisheries legal frameworks are managed by each state, marking with owner ID is required, see e.g. https://www.lfvmv.de/download/FischGMV.pdf • The Waste Management Act (KrWG) • Revised waste disposal act (AbfG) • Marine Strategy Framework Directive (MSFD) • Gewerbeabfallverordnung (GewAbfV) |
| Latvia | <p>Republic of Latvia Cabinet Regulation No. 296 (adopted 2 May 2007) Regulations Regarding Commercial Fishing in Territorial Waters and Exclusive Economic Zone. According to point 8.25. if fishing gear has been lost, to notify the State Environmental Service regarding such fact in accordance with the procedures laid down in the laws and regulations of the European Union. https://likumi.lv/doc.php?id=156709</p> <p>Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No 847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing</p> |

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| | <p>Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006 https://eur-lex.europa.eu/search.html?DTN=1224&SUBDOM_INIT=ALL_ALL&DTS_DOM=ALL&CASE_LAW_SUMMARY=false&type=advanced&DTS_SUBDOM=ALL_ALL&excConsLeg=true&typeOfActStatus=REGULATION&qid=1536218276179&DB_TYPE_OF_ACT=regulation&DTA=2009&locale=en</p> |
| Lithuania | <p>COUNCIL REGULATION (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No 847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006</p> |
| Poland | <p>In order to prevent the loss of fishing gears, We apply the requirements of the EU Common Fisheries Policy (Reg. 1380/2013), as well as the (Commission Regulation 404/2011 concerning detailed rules for marking the nets), and the Control Regulation 1224/2009.</p> <p>These rules were transposed to Polish legislation by Article 6 and 10 of the Act of 14 December 2014 on marine fisheries (http://prawo.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20150000222), and by Articles 21-23 of the national Regulation of the Minister of Maritime Economy and Inland Navigation of 17 of September 2016 regarding dimensions and protection periods of marine organisms and specific rules for conducting marine fisheries (http://prawo.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20160001494).</p> <p>When finding ALDFG, in accordance with the national legislation (fisheries law – O.J.2018.514.) art. 6 point 3 and 4, it should be removed from the sea and delivered to the Director of the Maritime Office http://prawo.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20150000222 or http://www.lex.pl/du-akt/-/akt/dz-u-2018-514-t-j including the recent changes, not related however to ALDFG.</p> <p>Main provisions with regards to management of property extracted from the sea (ALFDG) are included in the Maritime Code (Act of 18 September 2001 on Maritime Code) http://prawo.sejm.gov.pl/isap.nsf/download.xsp/WDU20160000066/U/D20160066Lj.pdf, including recent changes as well as in Regulation of the Minister of Infrastructure of 28 April 2004 r. on procedures for determining the owner of property extracted from the sea http://prawo.sejm.gov.pl/isap.nsf/download.xsp/WDU20041101167/O/D20041167.pdf.</p> <p>The owner of the property extracted is determined through the investigation procedure conducted by the Director of the Maritime Office. Marked gear is then passed to the owner, while unmarked but suitable for further use gear is intended for sale and auctioned by the Director of the Maritime Office according to Regulation of Minister of Justice of 13 December 2004 r. on determining the procedures of dealing with property extracted from the sea http://prawo.sejm.gov.pl/isap.nsf/download.xsp/WDU20042712689/O/D20042689.pdf</p> <p>All the remaining equipment is stored in the harbour areas under supervision of Director of Maritime Office.</p> |
| Russia | <p>There is no legal framework. There is no focused monitoring of ALDFG. In practice those fishing gears could be admitted as ALDFG which were detected as illegally fixed in accordance of message from local people which cause the check by environmental prosecutor or during ordinary work as area supervision by state environmental inspector or customs authority. The waters of the Gulf of Finland are under jurisdiction of the customs authority, internal waters including rivers, lakes etc. – the Federal agency of fisheries. Moreover, other authorities could deal with fishing gear – state inspectors for PA sometimes meet the issue to deleted illegal nets from the PA territory, administration of</p> |

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| | ports handle nets which occurred in port area and pose a danger for traffic or other port activities. |
| Sweden | <p>We have no special fee systems in our harbours.</p> <p>European Parliament and Council Directive 2000/59/EC of 27 November 2000 on port reception facilities for ship-generated waste and cargo residues.</p> <p>The Fisheries Agency Regulations (FIFS 1994:14) concerning the labelling and marking of fishing gear and the obligation to report lost fishing gear.</p> <p>https://www.havochvatten.se/download/18.1d58828a15f50337fd466938/1509087276171/HVMFS-FIFS-1994-14-keu-1107.pdf</p> |

Is there data available on the amount of annually lost fishing gear (FG) in waters under national jurisdiction?

| Country | Data on annually lost FG |
|-----------|---|
| Denmark | Yes. Data can be provided from the Danish Fisheries Agency |
| Estonia | At the moment there is no reporting system for the lost fishing gear, and thus no data are being provided. |
| Finland | No |
| Germany | No. As already mentioned above, lost fishing gear has to be reported if it cannot be retrieved. However, reporting is not sufficiently enforced in Germany and communication with clear provisions for the fishermen missing. Hence, one report of lost fishing gear was available in the reporting database in 2016 only. |
| Latvia | Partly. State Environmental Service (SES), which is the competent authority for the fisheries control in Latvia, informs that between 2012 and 2018 it has received information about 12 lost fishing gears. Information about lost gears is provided to SES inspectors, also the coastal fishermen can make appropriate notes in the fishing logbook. Unfortunately, information about the precise number of lost gears, types of gear and its specifications is not registered by SES, so accurate data are not available. |
| Lithuania | No |
| Poland | <p>Partly. Poland has only limited information about lost fishing gears. Regarding fisheries inspectors, they obtain information about lost, or more often, not marked, illegal nets from coastal guard or from their own control operations at sea. Data about lost fishing gears are usually not included in the logbooks.</p> <p>Fisheries inspectors do not have registry of lost fishing gears.</p> <p>Basing on experiences that WWF Poland has had in DFG search and retrieval projects since 2011. Also, within MARELITT Baltic project Simrishamn municipality in Sweden, WWF and Keep the Estonian Sea Tidy in 2016 have lead the surveys among Baltic fishermen asking about the amounts and reasons for gear loss in the Baltic, more information is available here: https://www.marelittbaltic.eu/calender/conference</p> <p>https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5a27b5c1652dea2700afb72c/1512551880578/Reasons+for+gear+loss+changes+in+fisheries.pdf</p> <p>According to provisions of the Act on Maritime Code the owner of the property lost at sea is obliged to inform the Director of the Maritime Office (within 6 months from the date the property was lost) on the time and the procedure of retrieving the property.</p> <p>The information received from Directors of Maritime Offices indicates that during past years there were only few reports from the owners of the lost fishing gear reported on the intended retrieval of the equipment. There was also only 1 case that the owner of the ALDFG was found through the procedure described in p. 3.</p> |

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| Russia | No. Information could be provided for separate water bodies in the North-west federal district of Russia. Custom service who is in charge from the Gulf of Finland. |
| Sweden | Partly. Our fishing fleet has to report when their fishing gear is lost to FMC but there has not been that many reports during several years so maybe the numbers are not correct. https://www.havochvatten.se/hav/fiske--fritid/yrkesfiske/regler-/rapportera-forlorade-redskap.html |

Is there data available on the amount of annually recovered fishing gear in waters under national jurisdiction?

| Country | Data on annually recovered FG |
|-----------|--|
| Denmark | No |
| Estonia | Partly. There are only some data on the illegal fishing gear that is retrieved by the Environmental Inspectorate. Some data will be available from the INTERREG project MARELITT (WP 2: Running full-scale cleaning operations). |
| Finland | No |
| Germany | Partly. There are no concerted official efforts to retrieve ALDFG. However, WWF Germany retrieves ALDFG from the Baltic Sea financed by the EU-project MARELITT Baltic. Amounts retrieved are published on the WWF webpage: http://www.wwf.de/geisternetze and https://www.wwf.de/themen-projekte/projektregionen/ostsee/projektfortschritt-geisternetze/ . Furthermore certain amounts are retrieved by operations of diving associations /scientific institutes and through Fishing-For-Litter activities. |
| Latvia | No |
| Lithuania | No |
| Poland | <p>Partly. In 2015 WWF Poland in cooperation with Kołobrzeg Fish Producers Group and Polish fishermen recovered 268 tonnes of DFG from the Baltic. Report in English is available under the link :</p> <p>http://www.wwfpl.panda.org/co_robimy/morza_oceany_glowna/aktualnosci.cfm?17640/268-ton-sieci-widm-wyłowionych-z-Baltyku</p> <p>Since 2016 WWF Poland takes part in the international project MARELITT Baltic. Within the project collection of DFG is organised in 4 Baltic Sea Region countries: PL, EE, SE and DE. Final results will be published in March 2019 on the website https://www.marelittbaltic.eu/ Preliminary results showed that in 2017 in Polish EEZ 3037 kg of marine litter was recovered by MARELITT Baltic project. The division into different types of litter was the following:</p> <p>271 kg gillnets 387 kg trawl nets 7 kg not identified nets 2372 kg – cables, steel ropes, parts of fishing equipment (but not fishing gear).</p> <p>Data collected from the Directors of the Maritime Offices indicates that in most cases the ALDFG retrieved from the sea and stored in the harbour areas is either considered as waste because is no longer suitable for further use or comes from poaching activities.</p> <p>Amount of ALDFG received by Directors of Maritime Offices:</p> <p>2016: not identified nets: 4250 m + 1860 kg fyke nets: 3 units</p> <p>2017: not identified nets: 2730 m + 1860 kg fyke nets: 3 units longlines: 0 gillnets: 0 fish traps: 3</p> <p>2018: not identified nets: 4250 m + 1860 kg</p> |

| | <p>fyke nets: 27 units longlines: 1250 m gillnets: 460 m fish traps: 2 units</p> <p>Stored fishing gear is periodically sent for disposal by Directors of Maritime Offices. Currently few tonnes of waste fished gear stored in the harbor areas.</p> | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------|---|---|------------------|---|------------------|-----------|--------|--|--|-----------|--------|-----|-----|------|--------|--|--|------|--------|--|--|--------------|----------------|------------|------------|
| Russia | Partly. Data available for internal water bodies and for the Gulf of Finland for occasionally detected fishing gears taking into account the fact that there is no legislative aim to find all fishing net which could be considered as lost or ghost. | | | | | | | | | | | | | | | | | | | | | | | | |
| Sweden | <p>Yes.</p> <table border="1"> <thead> <tr> <th>Years</th> <th>Fishing yarn (m)</th> <th>Sport fishing equipment in the form of han lines for cod fishing (unit)</th> <th>Eel traps (unit)</th> </tr> </thead> <tbody> <tr> <td>2000-2006</td> <td>47 123</td> <td></td> <td></td> </tr> <tr> <td>2007-2013</td> <td>44 540</td> <td>465</td> <td>123</td> </tr> <tr> <td>2016</td> <td>17 061</td> <td></td> <td></td> </tr> <tr> <td>2017</td> <td>33 776</td> <td></td> <td></td> </tr> <tr> <td>Total</td> <td>142 500</td> <td>465</td> <td>123</td> </tr> </tbody> </table> | Years | Fishing yarn (m) | Sport fishing equipment in the form of han lines for cod fishing (unit) | Eel traps (unit) | 2000-2006 | 47 123 | | | 2007-2013 | 44 540 | 465 | 123 | 2016 | 17 061 | | | 2017 | 33 776 | | | Total | 142 500 | 465 | 123 |
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| 2000-2006 | 47 123 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2007-2013 | 44 540 | 465 | 123 | | | | | | | | | | | | | | | | | | | | | | |
| 2016 | 17 061 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2017 | 33 776 | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 142 500 | 465 | 123 | | | | | | | | | | | | | | | | | | | | | | |

Is there information available on the adequacy of ports to receive, separately collect and sort the derelict fishing gear collected from the sea as well as end-of-life fishing gear?

| Country | Adequacy of ports |
|-----------|--|
| Denmark | Yes. Port reception facilities in most fishing harbours |
| Estonia | Yes. Analysis has been conducted within the framework of INTERREG Project MARELITT: https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5b3caee9f950b77f5173a458/1530703611675/Harbour+Survey_final.pdf |
| Finland | No |
| Germany | Partly: MARELITT Baltic reports on harbour reception facilities covers 15 German harbours: https://www.marelittbaltic.eu/documentation/ Collection facilities for ALDFG are not generally available, a general system for collection is not in place. However, collection of end-of-life fishing gear is organised and financed by some fisheries associations: in harbours owned by producer groups, it is generally possible to dispose of its decommissioned fishing nets. In addition, in many ports on the German coast, the project Fishing for Litter (https://www.nabu.de/natur-und-landschaft/aktionen-und-projekte/meere-ohne-plastik/fishing-for-litter/index.html) was established. |
| Latvia | No. Information about port readiness to receive ALDFG can be found in the Port's waste handling plans, where it is stated that it is possible to deliver fishing gear at port's waste reception facilities, however it is not specified what sort of fishing gear. Fishing gear delivery is covered by no-special fee system, however SES has no information that this type of waste have been delivered in recent years. Therefore, it is not possible to determine adequacy of ports to receive ALDFG. |
| Lithuania | Yes: http://www.kratc.lt/about-kratc/information-about-company |
| Poland | Yes: In frame of MARELITT Baltic project the survey has been lead among chosen Baltic ports by Keep the Estonian Sea Tidy. The results are presented in the report: https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5b3caee9f950b77f5173a458/1530703611675/Harbour+Survey_final.pdf In all ports harbours and marinas there are port reception facilities able to receive derelict fishing gear, although in most cases there are no separate facilities for fishing equipment. |
| Russia | Yes. There is no stipulated manage of fishing gears. In case of detection of a fishing gear at the waters which belong to the port area they pick it up and handle it as waste (usually displacement at landfill). |

| | |
|--------|--|
| Sweden | Partly. SwAm has co-financed the Marelitt Baltic project that recently presented The Harbour Survey by M. Press. But the west coast of Sweden was not included in this survey. |
|--------|--|

Is there information available on practices to utilise separately collected fishing gear including their recycling? Are you aware of challenges to recycle collected fishing gear?

| Country | |
|-----------|---|
| Denmark | No. The Danish company Plastix produces recycled raw materials (plastic pellets) based on post use input streams collected from the maritime industry. http://plastixglobal.com/products-and-services/oceanix-products/ |
| Estonia | No. Most probably it is used for energy recovery (incineration), disposed in landfills or sold abroad for recycling. The reporting is based on the waste codes of the EU List of Waste (2014/955/EU), there is a sub-group '02 01 wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing', more precisely waste code '02 01 04 waste plastics (except packaging)'. This waste code covers different plastics as materials, but also as different initial products and does not let distinguish, which part of it was the ALDFG. Special waste code for ALDFG and/or sea-born plastics would improve the situation. |
| Finland | No |
| Germany | No. In general no take-back/deposit/recycling systems are available so far, fishing gear is incinerated together with household waste. Currently, in the context of the German Round Table on Marine Litter take back/deposit/recycling options together with possibilities to establish EPR schemes are recognized and evaluated for future application. Amounts fished during FFL operations are subject to pilot projects evaluating their potential recyclability: https://www.nabu.de/natur-und-landschaft/aktionen-und-projekte/meere-ohne-plastik/fishing-for-litter/index.html . Furthermore recycling trials with ALDFG were carried out in MARELITT Baltic – a correspondent report produced by WWF Germany will be available on https://www.marelittbaltic.eu/documentation/ . |
| Latvia | No |
| Lithuania | No |
| Poland | Yes. Information in this regard is being collected by WWF Germany in frame of MARELITT Baltic project. Some first results are presented on the website: https://www.marelittbaltic.eu/news/2018/5/23/recycling-workshop-in-stralsund and https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5b1e3b8c88251b8e2e3dc842/1528707991777/Andrea+Stolte%2C+WWF+Germany.pdf Final report will be published in March 2019 on https://www.marelittbaltic.eu/ |
| Russia | No. In ports, fishing gears are managed as waste. In case of detection by customs or any other authority it is firstly stored pending an investigation of ownership (1 year) then transferred to state ownership who takes further decision about handling (usually incineration, placement at landfill, rare recycling as pilot project). |
| Sweden | Yes. The organisation FF Norden http://www.ffnorden.se/miljööatverning-11207855 that works closely with the Swedish municipality Sotenäs. We are aware of challenges to recycle collected fishing gear. |

Has information been compiled and/or guidelines on best practices to reduce the amount of ALDFG from commercial and recreational fishing to the Baltic Sea been elaborated⁹?

| Country | |
|---------|----|
| Denmark | No |

⁹ This question is linked to Actions RS7 in the Regional Action Plan on Marine Litter ([HELCOM Recommendation 36/1](#)).

| | |
|-----------|---|
| Estonia | On-going. Analysis will be conducted within the framework of the INTERREG Project MARELITT (WP3: Responsible fisheries prevention scheme) |
| Finland | No. In March 2018 a project proposal has been launched to ELY Centre (Regional Business and Industry Centre) for national European Marine Fishery Fund (EMFF) funding in order to start a pilot study of ALDFG in the Finnish Coastal waters (Bothnian Sea and Archipelago Sea). The main objectives of the project are to identify and map the possible areas of ALDFG, remove the identified gears together with local fishermen, store and handle the removed fishing gear and tackles and test the possibilities to recycle the collected material. |
| Germany | On-going. In the framework of the MARELITT Baltic project guidelines for the retrieval, mitigation of loss, marking, and handling of ALDFG will be provided by early 2019. https://www.marelittbaltic.eu/ |
| Latvia | No |
| Lithuania | No |
| Poland | Yes. As a one of the results of the MARE foundation project: „Conservation and restoration of marine biodiversity and ecosystems in the framework of sustainable fishing operations, consisting of retrieval of derelict fishing gear and marine litter – Clean Baltic” was a list of recommendations in order to reduce the amount of ALDFG coming from commercial fishing. More information can be found for e.g. here: http://home.fundacjamare.pl/wp-content/uploads/2018/01/r4-mierzeja-ang.pdf . In frame of the MARELITT Baltic project- ongoing. Final report will be published in March 2019 on https://www.marelittbaltic.eu/ |
| Russia | No. |
| Sweden | On-going. Through the Marelitt Baltic Project and the Simrishamn marine centre. https://www.marelittbaltic.eu/news/2018/7/11/environmental-impact-assessment |

Have best practices on removal of ALDFG been promoted¹⁰?

| Country | |
|-----------|--|
| Denmark | Planned. Project planned for 2019 |
| Estonia | Planned. Activity is planned in the framework of the INTERREG Project MARELITT. |
| Finland | No |
| Germany | Yes. An environmental impact assessment for retrieval methodologies was commissioned by WWF Germany as part of MARELITT Baltic & best-practice retrieval methodology guidelines have been produced: https://www.marelittbaltic.eu/ . Although there are no official recommendations so far, retrievals are often carried out in consultation with the nature protection authorities: https://www.nabu.de/natur-und-landschaft/aktionen-und-projekte/meere-ohne-plastik/fishing-for-litter/index.html |
| Latvia | No |
| Lithuania | No |
| Poland | Yes. Fisheries inspectors have been involved in several activities to promote best practices regarding marine litter including ALDFG, through distribution of |

¹⁰ This question is linked to Actions RS6 in the Regional Action Plan on Marine Litter ([HELCOM Recommendation 36/1](#)).

| | |
|--------|---|
| | <p>information materials from NGOs and scientific institutes among fishing vessels' owners as well as those involved in recreational fisheries.</p> <p>These materials are mainly publications, leaflets and posters regarding ALDFG retrieval actions and studies on ALDFG including reporting and delivering by-caught, dead, protected animal species.</p> <p>In addition, the MARE foundation project: "Conservation and restoration of marine biodiversity and ecosystems in the framework of sustainable fishing operations, consisting of retrieval of derelict fishing gear and marine litter – Clean Baltic" has been carried out in 2017. It consisted of many actions at promoting of best practises on ALDFG as well as retrieving lost fishing gears. More information about the project can be found here: http://home.fundacjamare.pl/co-robimy/odpady-morskie/projekt-czysty-baltyk/.</p> <p>In the frame of MARELITT Baltic project set of capacity building meetings has been organised in PL, EE, DE and SE.</p> <p>Maritime Offices cooperate with fishing communities and non-governmental organisations in activities related to retrieval of ALDFG from the sea, e.g.: http://www.wwfpl.panda.org/co_robimy/morza_oceany_glowna/ghost_fishing/rezultaty/</p> |
| Russia | No. |
| Sweden | <p>On-going. Through the Marelitt Baltic Project and the Simrishamn marine centre.</p> <p>https://www.marelittbaltic.eu/news/2018/7/11/environmental-impact-assessment</p> |

Are you aware of any extended producer responsibility scheme established for fishing gear in general? And for fishing gear containing plastic (including incentives mechanisms to deliver derelict fishing gear to port reception facilities)?

| Country | |
|-----------|--|
| Denmark | No |
| Estonia | Planned in the framework of EU directive on the reduction of the impact of certain plastic products on the environment |
| Finland | No |
| Germany | Partly. EU Control Regulation 1224/2009 (art. 48) contains general EPR provisions for products, but no special provisions for fishing gear. Danish providers take back gillnets for repair. |
| Latvia | No |
| Lithuania | No |
| Poland | <p>Planned/No. European Strategy for Plastics in a Circular Economy, COM(2018) 28 final, recognizes a need to stop the generation of marine litter and introduces measures to prevent, combat and clean-up litter. It also recognizes that large portion of plastic in marine environment comes from abandoned, lost and discarded fishing gear containing plastic which indicates that the existing legal requirements do not provide sufficient incentives to return such fishing gear to shore for collection and treatment.</p> <p>As part of the work under the above mentioned strategy it was underlined that plastic components of fishing gear have a high recycling potential, it was also recognized that, in line with the polluter pays principle, the most efficient scenario to tackle fishing gear and complement the existing legislations' gaps is</p> |

| | |
|--------|---|
| | <p>the introduction of an extended producer responsibility scheme for producers of fishing gear containing plastic. It would underpin and facilitate full implementation of other instruments, and further help to decrease the inflow amount of litter from fishing gear. EC introduced a proposal for a Directive of the EP and the Council on the reduction of the impact of certain plastic products on the environment https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:52018PC0340</p> <p>This proposal builds on and supplements the Control Regulation and the proposed revised Port Reception Facilities Directive by adding a dedicated mechanism facilitating separate collection and return of fishing gear to collection systems and treatment of waste fishing gear, in particular recycling. It is foreseen that this will, in particular, contribute to easing cost burdens for small scale ports and/or fishing operators who may face higher costs linked to increased collection and treatment of waste fishing gear once delivered in ports.</p> |
| Russia | No. In order to preserve aquatic biological resources and their habitats, it is prohibited to import fishing nets into the territory of the Russian Federation from synthetic materials, electric pulse fishing systems. Item 4 of Article 26 of Federal law №166 from 20/12/2004. |
| Sweden | Yes. Iceland has extended producer responsibility scheme established for fishing gear and Norway have some sort of a producer responsibility. http://www.circularocean.eu/wp-content/uploads/2017/09/Barrier-assessment_FINAL.pdf |

Have the sites of accumulation of ALDFG been identified and mapped?¹¹

| Country | |
|-----------|---|
| Denmark | Planned. Project planned for 2019 |
| Estonia | Planned. Analysis will be conducted within the framework of INTERREG Project MARELITT (WP4: Modelling of DFG host area maps). |
| Finland | No |
| Germany | On-going. WWF Germany produces a hot spot map for German waters of the Baltic Sea, which will be available from the MARELITT Baltic webpage, an extension for the North Sea is currently strived for. In this context collaboration with fishermen and divers has turned out crucial. An official map so far does not exist. |
| Latvia | No |
| Lithuania | Yes. In 2012-2013 Klaipeda University made primary estimation of places of accumulation of ALDFG in the exclusive economic zone of Lithuania in the Baltic Sea. |
| Poland | On-going. In the frame of MARELITT Baltic project. Final report will be published in March 2019 on https://www.marelittbaltic.eu/ |
| Russia | No. |
| Sweden | On-going. Through the Marelitt Baltic Project and the Simrishamn marine centre but the hotspots are only in the Baltic Sea and not the West coast. We are preparing a digital tool called GhostGuard that will help recreational fishermen to report where they have lost their gear. The plan for GhostGuard is that it is going to help the identification of hotspots. https://www.marelittbaltic.eu/news/ |

¹¹ This question is linked to Actions RS10 in the Regional Action Plan on Marine Litter ([HELCOM Recommendation 36/1](#)).

Have the reasons of accumulation of ALDFG in these sites (see question 11) been identified in order to undertake adequate measures to prevent their accumulation?

| Country | |
|-----------|--|
| Denmark | No. Project planned for 2019 |
| Estonia | No |
| Finland | No |
| Germany | Partly. Wrecks and other underwater obstacles are the most prominent accumulation sites in German waters (before GPS losses). Losses today are dominated by boat accidents and unexpected weather change, focus for search activities are gillnet areas inside the 3-mile coastal zone. |
| Latvia | No |
| Lithuania | No |
| Poland | Partly. Basing on experiences that WWF Poland has had in DFG search and retrieval projects since 2011. Also, within MARELITT Baltic project Simrishamn municipality in Sweden, WWF and Keep the Estonian Sea Tidy in 2016 have led the surveys among Baltic fishermen asking about the amounts and reasons for gear loss in the Baltic. More information is available here: https://www.marelittbaltic.eu/calender/conference and https://static1.squarespace.com/static/58525fe86a4963931b99a5d1/t/5a27b5c1652dea2700afb72c/1512551880578/Reasons+for+gear+loss+changes+in+fisheries.pdf Final report will be published in March 2019 on https://www.marelittbaltic.eu/ |
| Russia | No. |
| Sweden | Partly. Sweden has a government commission for littering where one of SwAm's tasks is to investigate a fishing ban close to wrecks. |

Has the removal of ghost nets and their safe management on land been initiated in those locations where they have been identified as posing a threat to the environment? ¹²

| Country | |
|-----------|---|
| Denmark | No. Project for more knowledge on the subject planned for 2019. |
| Estonia | On-going. In the framework of the INTERREG Project MARELITT (WP2: Running of full-scale cleaning operations (dragging/wreck)). |
| Finland | No |
| Germany | No. Official retrievals are not carried out unless nets pose a risk to shipping or fisheries. Sensitive areas are avoided during MARELITT Baltic retrieval actions to avoid damage to seafloor ecosystems. The MARELITT Baltic EIA analyses the impact of ALDFG on the marine environment from the plastic litter perspective. |
| Latvia | No |
| Lithuania | No |
| Poland | Yes. Cooperation on removal of ALDFG from marine environment between fisheries inspectors and relevant responsible authorities have been carried out through reporting of all abnormalities concerning marine litter including ALDFG. Additionally, several times ALDFG found in the sea by fishermen, have been delivered by fisheries inspectors to the relevant authorities in the harbours. The MARE foundation project: "Conservation and restoration of marine biodiversity and ecosystems in the framework of sustainable fishing operations, |

¹² This question is linked to Actions RS11 in the Regional Action Plan on Marine Litter ([HELCOM Recommendation 36/1](#)).

| | |
|--------|---|
| | <p>consisting of retrieval of derelict fishing gear and marine litter – Clean Baltic” in 2017 carried out several actions aimed at retrieval of ALDFG, especially from coastal areas of a high natural value, including Natura 2000 sites.</p> <p>Within the WWF Poland MARELITT Baltic project- removal of DFG has been led on the hot spots identified by fishermen and divers.</p> |
| Russia | No. |
| Sweden | <p>On-going. But only in some places like for instance ghost nets have been removed from wrecks when they are being sanitized. During 2017 and 2018 SwAm will sanitize one of Sweden's most environmentally hazardous wrecks, the fishing vessel Thetis. And at the same time ghost nets are being removed from the wreck.</p> <p>https://www.havochvatten.se/hav/fiske--fritid/miljopaverkan/vrak/thetis.html</p> |