

Feedback from European Marine Board to [European Commission's revision of EU waste shipments rules](#) (20 March 2020)

We welcome this initiative of revision of the Waste Shipment Regulation (WSR) to align better with the new Circular Economy Action Plan and the European Green Deal in general. We would like to highlight the importance of having a strong and encompassing WSR for the ocean and the European seas.

The EU coastline is 68,000 km long — more than three times longer than the United States' coastline and almost twice that of Russia (EEA figures). And almost half of the EU population lives less than 50 km from the sea; being the majority concentrated in urban areas along the coast (Eurostat figures).

Considering this, the WSR should ensure appropriate waste management facilities (coastal and in-land) and national enforcement to make sure waste doesn't end up in the ocean instead (including waste coming from rivers and floodwaters). Land-fills is one of the main sources of marine litter, and reducing marine litter would help EU Members States achieving Good Environmental Status (GES) in their seas (Descriptor 10 of the Marine Strategy Framework Directive). In addition, links should be made with the Port Reception Facilities Directive (European Maritime Safety Agency), as it aims for a better management of marine litter delivered to EU ports in adequate port reception facilities.

We believe the aim of the revision to restrict the export of waste outside the EU shows the leadership that the world needs to live within its planetary boundaries. We should not be exporting our environmental problems outside our borders. In addition, we would like to highlight that transporting waste by ship creates unnecessary pollution (air emissions, alien species introduction, oil discharges, etc.), when waste resources can be treated in the EU.

Related to implementation, the revision of the WSR should offer the opportunity to ensure research, testing and indicators to make sure the waste management approaches applied don't have harmful impacts on humans or environment.