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FOLLOW-UP WORK EMANATING FROM THE ACTION PLAN TO ADDRESS MARINE PLASTIC LITTER

The need for urgency – comments on documents submitted to MEPC 75, 76 and 77

Submitted by FOEI, Greenpeace International, WWF, Pacific Environment and CSC[1]

SUMMARY

Executive summary:	The document comments on documents submitted to MEPC 75, MEPC 76 and MEPC 77. It requests an update on progress against all measures contained in resolution MEPC.310(73) and adequate time for discussion and identification of next steps. It also requests an update on engagement with the UNEP-led work related to global governance on plastic pollution and a potential negotiating mandate for a new global agreement on plastic pollution.
Strategic direction, if applicable:	4
Output:	4.3
Action to be taken:	Paragraph 14
Related documents:	MEPC 75/8/3, MEPC 75/8/4, MEPC 75/8/5, MEPC 75/INF.23, MEPC 75/18; MEPC 76/8 and MEPC 77/8

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the document on *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.2). It provides comments on documents MEPC 75/8/3 (Singapore), MEPC 75/8/4 (Vanuatu), MEPC 75/8/5 (Secretariat), MEPC 75/INF.23 (Secretariat) and MEPC 77/8 (Cook Islands et al.). It aims to draw further attention to the need for greater ambition in order to effectively deliver the IMO *Action Plan to address marine plastic litter from ships* (resolution MEPC.310(73)).

[1] Antarctic and Southern Ocean Coalition has supported the development of the document.

2 In 2018, IMO Members adopted the IMO *Action Plan to address marine plastic litter from ships* (resolution MEPC.310(73)). The resolution acknowledges the importance of preventing marine plastic pollution from ships and the contribution IMO can make to delivering the 2030 Agenda for Sustainable Development, particularly SDG 14.1 (UNGA res 70/1).

3 Due to the COVID-19 pandemic, MEPC has moved to a virtual format and there has been insufficient time for discussion of the Strategy to address marine plastic litter from ships considered by a Correspondence Group which met during 2019 (MEPC 75/8/3) or the GESAMP Working Group 43 interim report on Sea-based Sources of Marine Litter (MEPC 75/8/5 and MEPC 75/INF.23). Particularly concerning, documents to progress measures in the IMO Action Plan (e.g. MEPC 75/8/4) have been deferred for discussion for almost two years. As a result, almost three years after the adoption of the Action Plan, marine pollution from ships remains a grave threat to all environments on earth, as evidenced by the marine debris event in the Bering Strait region of Alaska in 2020 and being repeated in 2021,[2] and a common understanding of what steps IMO and IMO Member States have taken and the rate of progress remains unclear.

4 In document MEPC 75/8/3, the Committee is invited to note the progress on the draft Strategy to address marine plastic litter from ships and to request that the Secretariat track the status of the action items and update the grouping of actions on a regular basis, and to request that the Secretariat regularly update the Committee on the status of the actions in the Action Plan. The co-sponsors very much welcome the development of a Strategy and proposals for reporting to the Committee on a regular basis.

Plastic pollution – a growing concern

5 Documents MEPC 75/8/5 and MEPC 75/INF.23 present the initial findings on the state of knowledge on sea-based sources of marine litter from GESAMP WG 43. This work is regarded as work in progress. A second interim report was made available online (MEPC 76/8). Despite the absence of opportunities to discuss the progress on implementing measures within the Action Plan, the body of evidence about the impact of sea-based sources of plastic pollution continues to grow. The recent GESAMP WG 43 report noted as a principal finding, "sea-based activities and industries contribute to the global burden of marine litter, and that this warrants concern largely because synthetic materials comprise significant portions and components of litter entering the world's oceans from fishing, aquaculture, shipping, ocean dumping and other maritime activities and sources. Furthermore, certain types of sea-based marine litter, such as ALDFG, are known to impact marine resources, wildlife and habitats". The second interim report presents further work on estimating the relative contribution and impacts of different sea-based sources of marine litter, identification of data gaps and priorities for further work, and also on quantifying the environmental, social and economic impacts of abandoned, lost, or otherwise discarded fishing gear (ALDFG) (see paragraph 8).

6 In addition, new research from the University of Plymouth's International Marine Litter Research Unit has revealed that the hauling of rope, which is typically performed on board maritime vessels such as fishing boats, could result in billions of microplastic fragments entering the ocean every year.[3] Though efforts to quantify the overall contribution of sea-based sources, generally – and crudely – estimated at 20% of the overall contribution to the plastic pollution burden, with 80% originating on land, continue to pose challenges and geographical variations, concerns about the durability and toxicity of plastic pollution in the oceans remain.

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2 Foreign trash continues to wash up on regional shores – The Nome Nugget.

3 Napper, I. E., Wright, L.S., Barrett, A.C., Parker-Jurd, F.N.F. & Thompson, R.C., 2022. Potential microplastic release from the maritime industry: Abrasion of rope, Science of The Total Environment, Volume 804.

7 In recent years there has been widespread recognition of the scale and severity of the plastic pollution crisis, culminating in successive United Nations Environment Assembly (UNEA) resolutions (1/6, 2/11, 3/7, 4/6, 4/7 and 4/9), the establishment of the Ad Hoc Open-Ended Expert Group on Marine Litter and Microplastics (AHEG) and, most recently, the tabling of a draft resolution for UNEA 5.2 in 2022 calling for the establishment of an Intergovernmental Negotiating Committee (INC) to negotiate a new legally binding global instrument to reduce plastic pollution and establish a safe circular economy for plastics. As approximately two thirds of countries have expressed some form of support for such an agreement and global momentum coalesces around this topic, discussion about the critical role IMO can play in coordinating action on sea-based sources must continue apace.

Abandoned, lost and otherwise discarded fishing gear (ALDFG)

8 The GESAMP WG 43 report highlights where knowledge on sea-based sources of plastic pollution is increasing, in particular with regards to abandoned, lost and otherwise discarded fishing gear (ALDFG). Noting that despite limitations in availability of literature and knowledge gaps, an estimated 5.7% of all fishing nets, 8.6% of all traps and 29% of all lines are lost to the world's ocean annually.[4] The environmental and economic costs, in terms of unintended catch and depletion of fish stocks, damaged gear, lost fishing time and lost catch value, among other impacts, remain a steady source of concern. Despite this, work on ALDFG at IMO, in particular progress to make mandatory via an amendment to MARPOL Annex V the reporting of lost fishing gear, an essential step in preventing and mitigating this source of pollution, is making slow progress. Equally, ambition from IMO to make mandatory or otherwise drive the uptake of the FAO Voluntary Guidelines of the Marking of Fishing Gear urgently needs further work, including dedicating time for detailed consideration of document MEPC 75/8/4.

Plastic pellets/cargoes

9 The GESAMP WG 43 report also points to several large-scale disasters involving plastic pellets and recognizes the severity of their increasing contribution to marine plastic pollution, estimated globally at around 230,000 tonnes per year. Despite our understanding of pellet loss as a chronic environmental hazard, there are no obligations for relevant actors to ensure good operational practice, including packing, labelling, stowage, segregation and handling, as well as emergency response procedures to prevent pellet loss and safety measures to prevent container loss. Nor to ensure full transparency on container losses, facilitate container traceability to boost recovery, and clarify the legal status of lost containers and related environmental liabilities. The recent case of the **MV X-Press Pearl** disaster, in which tons of plastic pellets[5] have spilled into the marine environment, is just one example of how severe and complex a spillage of this nature can be, affecting both marine biodiversity and food security.

Extending the requirement for garbage record books and container loss

10 The accidental or intentional dumping at sea of waste and plastic materials due to bad handling or unfavourable weather conditions has identified the shipping industry as a significant source of plastic litter in the marine environment. Welcoming document MEPC 77/8 on garbage record books for vessels 100GT and above, there is a clear need for greater ambition. In particular, shipping companies have disclosed survey-based information figures of up to 10,000 containers lost annually at sea. Causes for cargo loss not only include extreme weather but also infrastructure failure, for example extremely heavy cargo, improper loading of pallets,

4 Richardson K, Hardesty BD, Wilcox C. Estimates of fishing gear loss rates at a global scale: A literature review and meta-analysis. Fish Fish. 2019;20:1218-1231.

5 News source on the disaster – personal communications with activists in Sri Lanka cite approximately 10,000 – 11,000 tonnes of plastic pellets based on estimates from cargo and the amount already recovered from beaches.

poor lashing, improper use of the cargo securing gear and incorrect or unbalanced stowage and inadequate weight distribution.[6] Container contents can break down to microplastic pollution over time as well as being sources of toxic pollutants and heavy metals. While the co-sponsors welcome the progression of certain measures on container losses being directed to CCC, the recent incident in Sri Lanka underscores the importance of urgent action in this area.

Microplastics in vessel grey water discharges

11 A large cruise ship at sea for one week can generate eight tonnes of solid waste. A ship with 3,000 passengers and crew members can generate approximately 56,800- 13,600 litres per day of sewage and 706,000 litres per day of grey water (drainage from dishwater, shower, laundry, bath and washbasin drains). Grey water can contain high levels of bacteria, nutrients, and other harmful substances,[7] and is a significant source of microfibres into the ocean,[8] particularly from washing machines on ships. MARPOL Annex IV requires vessels to treat sewage within 12 nautical miles of land before discharge, but grey water can be released directly into the ocean without any treatment. IMO needs to take action to better understand and address the environmental impacts a lack of grey water regulation has on the marine environment.

Beyond SDG 14 – plastic pollution and the sustainable development goals

12 Historically, action related to reducing marine plastic litter has been limited to discussion on SDG 14, in particular the desire to "prevent and significantly reduce marine pollution of all kinds, particularly from land-based activities, including marine debris" by 2025. While current estimates suggest we need much more ambitious and binding action in order to drive the "significant reduction", it is also clear that SDG 12: *Ensure Sustainable Consumption and Production Patterns*, should also form part of the framing and prioritization of actions to support the uptake of meaningful measures to reduce plastic pollution. Specifically, target 12.2 "to achieve the sustainable management and efficient use of natural resources"; target 12.4 "to achieve the environmentally sound management of all wastes throughout their lifecycle and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment"; and target 12.5 "to substantially reduce waste generation through prevention, reduction, recycling and reuse".

13 The urgency of plastic pollution and its impacts throughout its lifecycle require a broader interpretation of both the problem and the actions needed to address it and, specifically, the work IMO is undertaking in the context of the Action Plan must be part of a globally coordinated effort addressing both plastic and microplastic pollution at the source and across all economic sectors. Many of the interventions to address plastic pollution at sea begin on land and the work of IMO cannot happen in isolation, nor stop at port.

Action requested of the Committee

14 The Committee is invited to: (i) note the information contained above; (ii) request the Secretariat to provide an update on progress of items in the Action Plan; (iii) ensure sufficient time for discussion on the draft Strategy and on the findings and next steps emanating from the interim GESAMP WG 43 report, and (iv) request the Secretariat to provide an update on engagement with the UNEP-led work related to global governance on plastic pollution, in advance of UNEA 5.2 in February 2022 and a potential negotiating mandate for a new global agreement on plastic pollution.

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6 Surfrider Foundation Europe, 2019. Containers Overboard! 10 Proposals to Prevent Container Losses.

7 US EPA. (2011). Graywater Discharges from Vessels. Section 2: Graywater Characteristics.

8 Bhashyam, Sindhura & Nash, Roisin & Deegan, Malcolm & Pagter, Elena & Frias, João. (2021). Microplastics in the marine environment: Sources, Impacts & Recommendations.