

Bemærkninger til TG Marine Litter – Discussion paper. Draft 1 – June 2018

Notat fra DCE - Nationalt Center for Miljø og Energi

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Indhold

1	Formål og baggrund	3
2	DCE's bemærkninger	4

1 Formål og baggrund

Miljø- og Fødevarerministeriet har telefonisk og efterfølgende pr. email de 13. september 2018 anmodet om DCE's faglige input til kommentering af dokumentet "TG Marine Litter - draft Discussion Paper. Draft 1: June 2018". Miljø- og Fødevarerministeriet har modtaget dokumentet til kommentering efter møde i MSFD (Marine Strategy Framework Directive) Technical Group Marine Litter den 26.-27. juni 2018 på Cypern.

Et udkast til det foreliggende dokument blev drøftet mellem Miljø- og Fødevarerministeriet og DCE forud for mødet, og på baggrund heraf blev der udarbejdet mandatpapir af 22. juni 2018. Det er vores vurdering, at konklusionerne i dokumentet overordnet set er i overensstemmelse med konklusionerne på drøftelserne mellem Miljø- og Fødevarerministeriet og DCE.

2 DCE's bemærkninger

The discussion paper has listed six options for setting threshold values for marine litter. It is in the paper concluded that "The zero option" and "Point of no return and tipping points" do not appear to be reasonable options. We agree on that.

The option "Precautionary principle" might be an option. But the threshold values has to be based on expert judgements and we find that more scientific knowledge is needed before this option can be recommended for setting threshold values.

"Cut off values" is a well-known principle for setting assessment criteria in cases of insufficient data for setting quality criteria. Nevertheless, a precondition for this option is that there is enough data available and that the data is representative. We assume that it is not always the case for the marine litter.

"Lowest endpoint" could be an option but before this option is recommendable the scientific knowledge about the effects – toxicological, entanglement and economic needs to be improved. The discussion paper mentions that especially the knowledge about entanglement is very little, but in addition, the knowledge about toxic impact of marine litter on the marine ecosystem is scarce.

"Non-deterioration" is assessed to be the most preferable option at present. It is a pragmatic and operational tool for all countries. This option does not result in threshold values having the properties that the marine litter threshold should have as mentioned in the discussion paper. But none of the options possesses all the properties and until it is possible to set scientific based threshold values that meet the properties the Non-deterioration values should hinder increase of litter concentration.

We agree that individual thresholds for the different compartments are needed. It would be an even bigger challenge to set threshold values that cover all marine compartments.

The conclusion is that we find the options "Precautionary principle", "Cut of values" and "Lowest endpoints" might be available options but we assess that each of them are too premature for the moment.

We recommend using "Non-deterioration" option for setting intermediate threshold values for marine litter until scientific based threshold values can be set.