

BirdLife would like to provide the following feedback on the report:

### **Overall comments**

- The recommendations could be given greater prominence in some sections.
- Some of the pollution issues affecting marine areas are hidden within other topics. The big focus for marine seems to be on marine plastics, which is ok – but there could also be focus on chemical pollutants, endocrine disruptors etc.

### **3.1.2 targeted priority interventions – key pollution areas. (pages 40+)**

#### *Marine and Coastal pollution:*

- While agree most of the sources are covered in either freshwater, land or chemical sections, only lists impacts of marine litter/plastics. Misses discharges from industries directly into water either freshwater or marine (other than sewage). Unless this is what is meant by *Chemicals and waste* in point 27? It would be good if this could expand this point to make it clearer.

#### *Chemicals and waste point 20.*

- Should flag up impact of at sea mining and disposal of spoils at sea. Deep sea mining is a potential growth area in coming years, and in line with SDG 14, need to consider proactive steps.

#### *Chemicals and waste point 28.*

- Eliminate uncontrolled dumping (on land and sea?) and open-burning of waste.;

Given report states that (first section) “Food safety is therefore intimately linked to the state of the environment, the soil and land where food is produced, the marine environment where fish live, as well as the water that is used for food production” , this seems to be afforded much less attention than of plastic litter/marine plastics. Although arguably covered by point 20, would have expected a clear point on this something along the lines of “*Reduce exposure of fish and other seafood to pollution and contaminants, to reduce the environmental and health impacts from point source and diffuse pollution.*”

There’s already a similar legislative driver in the EU for this, under the Marine Strategy Framework Directive, which recognises the risk to the environment (either direct to species, or to predators from prey species) and links to human health.

### **Page 51:**

- Would be good if the “ecosystem based solutions” was given more prominence. Would align with other messages around better recognising the value of ecosystem goods and services.

### **3.3.1 (page 54) evidence based decisions.**

- Overall welcome and agree policy actions need to be used to address most pollution issues, especially when the know pathways etc. Would be good to give increased prominence to the comments about the need for effective governance more.

**Annex 3:**

- Should the MARPOL Convention (1997) also be listed under this annex?

**Annex 4:**

- Could benefit from additional references to EU legislation, e.g. WFD, MSFD, birds and habitats directives.