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Danish Ports response to a study for an Impact Assessment for the Revision of Directive 2000/59/EC on Port Reception Facilities

In general Danish Ports have adequate port reception facilities on waste.

In the study it is proposed that all EU ports should introduce a 100% indirect fee for garbage.

Danish Ports believes that a 100% indirect fee for garbage should only include Annex V garbage (plastics, food etc.). It should include limits/thresholds on volumes of waste and an exemption for hazardous waste, scrubber waste and Cargo residues to have an environmental impact on the port users.

Danish Ports' believes limits/thresholds on volumes of waste should only apply to the amounts generated since the last port arrived, not to generate "waste tourism" to some ports.

A 100% indirect fee regulation should be easy to operate, so it will not be an administrative burden for the ports.

Danish Ports welcome an improved separate collection in view of reuse and recycling of ship-generated waste.

Friendly regards

Danish Ports

Kasper Ullum

