Written submissions for the international legally binding instrument on plastic pollution

NOAH is the largest animal rights organization in Norway with 16 000 members. Our work focuses on increasing the respect, tolerance and consideration for all animals in politics and the population at large, as well as the importance of a more sustainable food system that considers the environment, biodiversity, animals and human health.

We strongly recommend:

- The main focus of the legally binding instrument should be the fisheries', fish farming's and agriculture's contribution to plastic pollution. Fisheries are the largest man-made impact on marine ecosystems, and we can not ignore that this industry is one of the main threats to the marine environment today. Fisheries are causing two main problems; aquatic species are injured and die due to the interaction with larger pieces of plastic, specifically macroplastics, and marine ecosystems are polluted with large amounts of microplastics, which can have toxic effects on fish and other aquatic organisms, including reducing food intake, delaying growth, causing oxidative damage and abnormal behavior. NOAH fully supports the ban of single-use plastics, but we need to address the main problem. Research indicates that around 70 % of macroplastics (in weight) is related to the fish industry.[1] Further, a study from January 2022 found a new sea-based source of microplastics, and suggests that a lot of the microplastics found in the ocean comes from the tearing of ropes that are used in the fishing industry.[2] The researchers predicted that each time a rope less than two years old is hauled in, it could release 700-2000 microplastic pieces, while rope two or more years old could emit 36000-38000 pieces of microplastic. The study concludes that with 4500 active fishing vessels in the UK which can spend 100 active days at sea, collectively this could result in 326 million to 17 billion microplastic pieces entering the ocean annually. Researchers agree that the fishing industry is not only a significant source of macroplastics and degraded microplastics, but also probably a major source of microplastics directly. **We need to specifically address these issues in the legally binding instrument.**

  Further, we need to specifically address the potential harmful effects of plastic pollution from agriculture. The Norwegian Institute for Water Research (NIVA) concludes that the potential threats of microplastic being transported to agricultural land are almost completely unknown and largely ignored. We clean the sewer to protect the sea from environmental toxins, and the sludge that remains is a resource that we recycle as

[1] https://www.theguardian.com/environment/2019/nov/06/dumped-fishing-gear-is-biggest-plastic-polluter-in-ocean-finds-report
[2] Napper IE, Wright LS, Barrett AC, Parker-Jurd FNF, Thompson RC. Potential microplastic release from the maritime industry: Abrasion of rope. Sci Total Environ. 2022 Jan 15;804:150155. doi: 10.1016/j.scitotenv.2021.150155. Epub 2021 Sep 4. PMID: 34520921.

fertilizer. The problem is that the fertilizer that farmers spread across land fields contains microplastics. The amount of microplastics that end up in European and North American fields each year is still unknown, but estimates have been somewhere between 110,000 and 730,000 tonnes.[3] It is urgent to assess the effects, and how dangerous this pollution is for soil organisms, other wild animals and human health. We need to address the very substantial contribution of animal agriculture to climate change and air pollution, to land, soil and water degradation and to the loss of biodiversity.

- Prioritization of measures to reduce ghost gear. Ghost gear, fishing equipment which is lost in the sea, can continue killing marine life for decades or even centuries after it first enters the ocean. More than 640,000 tonnes of nets, lines, pots and traps used in commercial fishing are dumped and discarded in the ocean every year.[4] Ghost gear is one of the most deadly forms of marine plastic debris, and should be a part of the international legally binding instrument on plastic pollution. It is vital that the world´s governments take action to protect our global oceans, and hold the fishing industry accountable for its dangerous waste.

[3] https://forskning.no/forurensning-landbruk-norges-forskningsrad/vi-gjodsler-jorder-med-mikroplast/1357119.

[4] https://www.theguardian.com/environment/2019/nov/06/dumped-fishing-gear-is-biggest-plastic-polluter-in-ocean-finds-report.