

Ad Hoc Open-Ended Expert Group on Marine Litter and Micro-plastics

Position paper of Bangladesh

1. Name of the Organization

Ministry of Environment, Forest and Climate Change (former Ministry of Environment and Forest)

General comments:

Bangladesh would like to thank the Secretariat for providing the opportunity to submit a position paper ahead of the ad hoc Open- ended Expert Group Meeting.

Given the working papers on the agenda the following views are important particularly applicable for Bangladesh.

2. Your view on major barriers to combatting marine litter and microplastics

We believe that measures for combating pollution of marine litter and microplastics should be considered and be taken based upon appropriate and sufficient scientific knowledge and with adequate legal instruments in place. Resource allocation and awareness of communities are also important. The barriers we think are applicable for Bangladesh as well as other developing countries are:

Legal barriers:

The Environmental Conservation Act 1995, as the main act for environmental protection of Bangladesh, covers the solid and liquid waste management of the whole country including marine waters. However, the management and reduction of marine litter need specific conditions we need to harmonize the laws with existing conditions and requirements for better management.

Although the country has a number of acts and rules focused on the pollution of the seas and solid waste management within the country it does not have any specific law or rule on the management of marine litter pollution. The Article 18A placed under the 2nd part of the Constitution which provides the fundamental principle of the state policy proclaims that ‘the state shall endeavour to protect and improve the environment and to preserve and safeguard the natural resources, biodiversity, wetlands, forests and wildlife for the present and future citizens’. The Bangladesh Biodiversity Conservation Act 2017, The Territorial Water and Meritime Zones Act 1974 and The Territorial Water and Meritime Zones Rules 1977 have provisions on the marine pollution Marine Fisheries Ordinance of 1983 also provides

protection of fisheries from marine pollution to some extent. The Coast Guard Act 1994 gives the opportunity to the coast guards of the Bangladesh to detect activities causing marine pollution and taking measures to stop it. The Environmental Conservation Act 1995 have provisions to protect the environment by enforcing against any pollution to the Air water and soil. The country also banned use of plastic shopping bags (upto certain milimeter of thickness) from 2002. Although the Rules of Medical Waste Management and Processing 2008 and the rules on the management of wastes from ship breaking industries (2011) have provisions for control of pollution from solid and liquid wastes, they are not specifically focused on Marine litters. Bangladesh is also a party to the UNCLOS 1969 and MARPOL Convention 1973. The Annex V of MARPOL conventions provides provisions for controlling littering of the foreign vessels at the coastal areas of the country.

Bangladesh has developed the action plan for ‘the sustainable abstraction of marine resources and its environmental management’. As a part of the action plan a number of acts relating pollution control of the marine environment are being developed. However, the grave nature of the current pollution of marine litter at the coastal areas requires more stringent provisions both in national and international arena.

Financial barriers

Limited funds for infrastructure for collection, treatment or disposal of plastic waste is one of the major barriers. There is limited understanding of the costs of marine litter pollution and its recovery. The cost of impacts on the human health is not yet known and sometimes they are not factored in. Although the 3R policy has been adopted by the Government of Bangladesh the technologies of recycling of plastics and the cost of them are unknown. We propose special financial instruments for the developing countries to reduce and manage the pollution of marine litter.

Data and Research

Bangladesh is currently preparing a draft position paper on the Marine litter pollution under SACEP initiatives. It was found that inadequate data availability on the existing pollution level of the Bay of Bengal was a major barrier for planning and designing the actions for the management of marine litter. With a limited funding from the SACEP headquarter it was only possible to identify the categories of litters along the eastern coasts of the country. However, the quantity has been unknown.

Awareness

Lack of consumer information, awareness and public participation is another barrier for proper management and reduction of marine litter. Cultural barriers and behavioural change is very important in this regard.

We also think that there is little recognition at the national and international policy level of the potential risks to human health, particularly from micro- and nano-plastics, and the

application of the precautionary principle and of freedom of information in this regard;

3. Your view on potential national, regional and international response options and associated environmental, social and economic costs

There are three options given in the discussion paper which are:

Option 1: Maintain status quo

Option 2: Review and revise existing frameworks to address marine plastic litter and micro-plastics and add a component to coordinate industry and

Option 3: A new global architecture with a multi-layered governance approach (and it's two Phases)

Our view is that Option 3 would be the best option to work with which also covers option 2.

Option 1 is not at all acceptable considering the grave nature of the pollution. Option 3 also will also give the opportunity to get benefits on the reduction of climate change benefits with an inclusive approach. We also think that the solutions to combat the pollution will be different for developed and developing countries and for various geographical locations.

there are varying solutions across regions, nations and on a subnational or municipal level e.g. what works in one region, nation or city is not necessarily applicable everywhere. We should recognize the ubiquitous, multi-media nature of the issue, considering the whole environment including marine waters, surface waters, watersheds and rivers, etc.

4. Your view on the feasibility and effectiveness of different response options

We think that the economic value of waste needs to be recognized harnessed and exploited. Therefore the industry owners should also be involved in the process. They can have collaborative approach with the government for innovation in the recycle and reuse of plastic and other litters.

5. Any other inputs

Developing countries often becomes the victims of the pollution created by the developed ones. Hence, additional funding and special measures for reducing and managing marine litter pollution will gain the support of developing countries for implementing the proposed actions.