Setting a robust and coherent EU legislative framework to achieve an ocean free from plastic pollution

Response from the Rethink Plastic Alliance to the public consultation on the EU Ocean Act

February 2026

About Rethink Plastic

The Rethink Plastic Alliance is a coalition of leading European NGOs advocating for ambitious EU policies to tackle the growing crisis of plastic pollution. It brings together the Center for International Environmental Law (CIEL), ClientEarth, the Environmental Investigation Agency (EIA), the European Environment Bureau (EEB), the European Environmental Citizen's Organisation for Standardisation (ECOS), Greenpeace, Seas At Risk, Surfrider Foundation Europe, and Zero Waste Europe. Together, these organisations represent thousands of active groups, supporters and citizens in every EU member State working towards a future free from plastic pollution.

How can the EU Ocean Act effectively address marine plastic pollution?

Introduction: Plastic gravely harms the ocean

Plastic, in various forms, is now ubiquitous in our rivers and oceans. It is estimated that over 170 trillion plastic particles circulate in the water column, while at least 11 million tonnes of plastic are deposited on the seafloor. While the full extent of plastic's harm on the ocean is yet to be researched, many impacts are already well documented, showing that plastic significantly contributes to the triple planetary crisis of biodiversity loss, climate change and pollution:

- Macroplastics, debris and microplastics are linked to severe harm or mortality in many species, including marine mammals, sea turtles and seabirds.
- Plastics contribute to chemical pollution in the ocean through multiple pathways, including the release of chemical additives during degradation in the marine environment and chemical leakage from plastic products and waste via runoff. Plastic particles can also act as vectors for other chemical pollutants and bacteria and pathogens, transporting them over long distances and increasing their potential harm when ingested by marine organisms.
- Plastic also affects the ocean's vital role in climate regulation as the largest carbon sink, most notably by altering phytoplankton behaviour, reproduction and survival, and by affecting sea-air greenhouse gas exchange.

- Plastic pollution in the ocean is now documented in the atmosphere, precipitation and terrestrial systems, demonstrating that marine plastic pollution feeds back into weather systems and human exposure pathways for microplastics, chemicals and toxins.

In short, plastic - in the form of macroplastics, debris, microplastics and nanoplastics - and the chemicals it contains severely impact the delicate balance of the ocean ecosystem, which harms ocean life and resilience, climate regulation and eventually our overall society. A polluted ocean affects food chains, economic and recreational activities, coastal communities, and ultimately human health. It is therefore essential that the Ocean Act addresses plastic marine pollution urgently, holistically and with a focus on prevention.

The EU Ocean Act must tackle pollution at source

Marine plastic pollution arises from sea- and land-based sources. The Ocean Act should therefore establish a comprehensive source-to-sea governance framework that links ocean protection with measures that tackle pollution at source and across the full lifecycle. Prevention must be the overriding principle.

Mitigation measures should be strategic and tailored to different sectors and pollution pathways, recognising that risks and solutions vary across the plastics lifecycle and other pollutant streams. Crucially, measures should prioritise prevention at source, rather than relying on costly retrieval once pollution has entered the environment. Retrieval can help address existing and legacy pollution, but only if conducted in an ecologically sensitive manner and without causing further harm to marine life and ecosystems.

The 2026 mid-term review of the Zero Pollution Action Plan highlights a knowledge gap regarding the impacts of certain pollutants, including microplastics, on health and biodiversity. However, existing science identifies plastic as one of the most prominent sources of marine pollution, with significant impacts on ocean biodiversity, resilience and climate regulation.

The main sources of plastic marine pollution include :

- **Mismanaged plastic waste and product leakage:** Single-use packaging and other short-lived plastic products dominate pollution entering rivers, coastlines, and storm drains, which eventually reach the ocean.
- **Shipping and maritime activities**: Significant plastic and microplastic pollution from plastic pellet loss during transport, container loss incidents, illegal waste discharges, antifoulant paint abrasion, greywater discharges and ropes that release microplastics.
- **Industrial and urban microplastic emissions**: Microplastics are released during plastic production, conversion and waste treatment processes, as well as through the degradation and fragmentation of macroplastics, such as tyres, textiles, packaging and agriplastics.
- **Fisheries and aquaculture equipment:** Synthetic ropes, lines and warps, buoys and fenders, net cuttings, fish aggregation devices, traps, pots and nets, as well as many other gear components, fisheries waste and operational plastics are persistent sources of plastic leakage, often poorly monitored or regulated. Abandoned, lost and discarded fishing gear remains one of the most harmful sources of marine plastic debris.

Multiple legislative and non-legislative steps have been taken over the past EU mandates to address sources of marine plastic pollution, including as part of the 2018 EU Plastics Strategy. Yet an overarching framework with clear targets for achieving a plastic-pollution-free ocean remains absent.

The Ocean Act must set a consistent policy framework to address marine plastic pollution

In the last decade, the EU has adopted several landmark pieces of legislation to address specific sources of plastic pollution, including the Single-Use Plastics Directive and the Regulation on Preventing Pellet Losses. Yet the EU still lacks a consistent legislative framework to address the vast and complex challenge of plastic pollution and ensure that different pieces of legislation work fully hand in hand to end marine plastic pollution. The Ocean Act is a key opportunity to establish a coherent ocean protection framework, including a strong vision and targets to end marine plastic pollution. Having a clear, legally binding framework will support the effective implementation of existing legislation and the adoption of necessary complementary legislative measures.

Pollution prevention should be central to this policy framework, with the aim of addressing plastic pollution at its source, encompassing material reduction, product design and systemic prevention practices. The Ocean Act should explicitly link marine protection objectives to horizontal product policy frameworks, particularly the Ecodesign for Sustainable Products Regulation, which has the potential to introduce binding requirements to reduce material shedding, prevent fragmentation, ensure durability and reparability, and minimise microplastic release during use of products placed on the EU market. Technical standards could address fibre shedding from textiles, tyre abrasion and coating failure and loss-prone design features in fishing and aquaculture gear.

EU funding to address plastic pollution should also prioritise prevention rather than clean-up. While research remains important, to date, too much focus has been placed on developing clean-up technologies through R&D programmes such as Horizon Europe, rather than on supporting R&D for prevention practices and the upscaling of best practices (e.g. prevention or reuse).

The current overemphasis on removal technologies misdirects public funds toward solutions that are environmentally risky, economically inefficient and structurally incapable of solving the pollution problem. Clean-up activities operate in complex marine ecosystems where plastics intermix with marine life and habitats, and pollution removal may unintentionally cause more harm. Moreover, the largest share of marine plastic pollution consists of fragments and microplastics dispersed throughout the water column and sediments. No existing technology can remove these particles at a meaningful scale without causing ecological damage, meaning clean-up can address only a small, visible fraction of pollution while leaving the overarching problem untouched.

From an economic perspective, clean-ups entail recurring, open-ended, continuous costs, whereas prevention delivers permanent reductions in pollution flows through systemic changes that generate long-term savings. There is also a risk that disproportionate funding for clean-ups reinforces the misconception that pollution can be effectively managed after it occurs.

Instead, dedicated EU funding should be allocated to ensure smooth, effective on-the-ground implementation. To give just one example of this, the EU Single-Use Plastic Directive provides for awareness-raising measures at national level without any dedicated source of funding, which has resulted in some Member States delegating their responsibility on awareness measures to national packaging industry awareness schemes instead, which have only aimed at securing high collection rates and have therefore not fulfilled the expected awareness goals of the SUP Directive.

The Ocean Act is a great opportunity to establish a consistent legislative framework to end marine plastic pollution, notably by setting clear overall targets, supporting the effective implementation of specific and/or sectoral measures to address plastic and microplastic pollution, and guiding appropriate funding towards prevention measures.

The Ocean Act must set quantitative EU targets on plastic pollution

The Ocean Act should enshrine into EU law existing targets to reduce plastic pollution set in the 2021 Zero Pollution Action Plan:

- Reduction of plastic litter by 50% by 2030; and
- Reduction of microplastic emissions into the environment by 30% by 2030.

In addition, **the Rethink Plastic Alliance recommends establishing 2040 targets to set a clear medium-term vision towards a plastic-pollution-free ocean**. Binding EU-wide targets on plastic pollution reduction will set a clear trajectory, guide investment and policymaking and strengthen the effective adoption and implementation of measures needed to achieve these overall goals, alongside sector-specific objectives.

The Ocean Act must support strong legislative measures to address plastic pollution, including from microplastics

To achieve an ocean free from plastic pollution, the EU Ocean Act must not remain a strategic vision alone. It should serve as a framework that actively drives, aligns and strengthens EU legislation addressing plastic pollution across its full lifecycle, including microplastic emissions.

Plastic pollution results from cumulative decisions across product design, material selection, chemical use, manufacturing, transport, use, trade and waste management. The Ocean Act must therefore reinforce a lifecycle approach to regulation, ensuring that marine protection objectives are systemically integrated into EU product, chemicals, industrial and waste legislation.

Addressing marine plastic pollution from single-use plastics and fishing gear

Single-use plastics and abandoned and lost fishing and aquaculture gear account for over 75% of marine macroplastic pollution, which motivated the adoption of the SUP Directive and the Port Reception Facilities Directive in 2019.

The Rethink Plastic Alliance recommends adopting additional legislative measures as part of the upcoming revision of the SUP Directive, and urges that the revision addresses current limitations and increases the legislation's impact. We recommend setting a single-use plastics phase-out

target and a high EU target for the collection of end-of-life fishing and aquaculture gear. This would go a long way in achieving the target to reduce plastic litter by 50% by 2030.

A comprehensive approach to microplastic pollution

Because microplastics are largely invisible in the marine environment, their pervasive presence has been overlooked for decades. Yet, microplastic pollution is widespread, persistent and effectively irreversible once released. It arises from a diversity of economic sectors: textiles, road transport, building and construction, shipping, agriculture and the fragmentation of macroplastic items, such as packaging, during use or once in the open environment.

Microplastics are close to impossible to retrieve once released into the environment: cleaning operations following recent plastic pellet spills in Spain, the UK and India provide concrete examples of the task's near impossibility and the astronomical associated societal costs. The financial scale is starkly illustrated by the Sri Lankan *X-Press Pearl* disaster, whereby the acute loss of a single vessel resulted in damages exceeding USD 40 billion. In 2025, the Supreme Court of Sri Lanka ordered an astounding USD 1 billion in compensation, a mere fraction of the total estimated harm, underscoring how post-loss response and remediation costs vastly exceed recoverable liability and are far more costly than the cost of prevention. It is therefore essential to prevent microplastic emissions in the first place rather than attempting to clean up the contaminated environment.

To date, EU legislative action to address microplastics pollution remains limited and insufficient. According to the EEA Zero Pollution Monitoring and Outlook 2025, the EU is off track to meet the 2030 objectives, with microplastic pollution increasing by 7-9% compared to the 2016 baseline. Current EU legislation focuses primarily on intentionally added microplastics (with many exemptions and long implementation periods) and on pellet loss (also with significant exemptions). Many other sources remain largely unregulated, including textiles, tyres, geotextiles and paints, hence the need for the adoption of legislative steps at EU and national levels to address those sources, in the context of the Ecodesign for Sustainable Products Regulation and beyond, which a strong Ocean Act framework would support. .

Protecting the ocean's health beyond Europe

The EU Ocean Act should ensure the health of the ocean, in Europe and beyond. It is well documented that macroplastics and even more so microplastics and chemicals can travel long distances at sea and concentrate in hotspots or be washed ashore in other countries or regions. Strong legislative measures in the EU can therefore support ocean protection beyond Europe and prevent the displacement of harm to the ocean in other parts of the world from EU activities.

Marine plastic pollution cannot be effectively addressed without tackling the role of waste trade in displacing environmental harm beyond EU borders. A significant share of plastic waste generated in the EU is exported to third countries, increasing the likelihood that such waste - or the domestically generated waste it displaces - will leak into the environment and ultimately the ocean. In that regard, it is essential to uphold the revised Waste Shipment Regulation and ensure its full and effective implementation, and that other legislation supporting EU circularity, such as end-of-waste criteria, does not create loopholes or gaps in waste trade regulations, thereby externalising the harm to the marine environment abroad.

Establishing a coherent legislative framework with clear targets to reduce marine plastic pollution in the Ocean Act, while ensuring an effective implementation of existing legislation with the appropriate funding, and adopting additional measures to address microplastics, can go a long way in reducing plastic pollution and protecting the ocean and all that depends on it.

The Rethink Plastic Alliance therefore recommends to :

- Enshrine into the Ocean Act the existing targets to reduce by 2030 plastic litter by 50% and microplastic emissions by 30%, and add 2040 targets to support a clear vision for a plastic-pollution-free ocean.
- Establish the Ocean Act as a coherent policy framework to address marine plastic pollution with the prevention and precautionary principles at its core, which will support the strong implementation of sectoral and/or specific legislations as well as the deployment of appropriate funding for the upscaling of pollution prevention measures and activities across Europe.
- Ensure the Ocean Act sets an holistic and systemic approach to ocean governance and protection, taking into account the various and additional sources of pressure on the ocean (e.g. plastic and chemical pollution, shipping, noise pollution, etc) so that it can contribute to addressing the triple planetary crisis of biodiversity loss, climate change and pollution effectively.