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2010-02-22Administrative officer
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Summary of analysis on prohibition of discharge of sewage from pleasure craft

On March 27, 2009, the Ministry of Industry, Employment and Communications formally assigned the task to the Swedish Transport Agency, in cooperation with the National Environmental Protection Agency and the Swedish Maritime Administration, to analyse the conditions for introducing prohibition of discharge of sewage from pleasure craft and how to set the limits. The main purpose of this report is to give answers to a number of problems stated in the assignment of the Government and to present information and data as a basis for decision on a possible introduction of the prohibition.

The proposal of the Swedish Transport Agency on prohibition of discharge of sewage from pleasure craft can be outlined in three parts as follows:

- A general prohibition stating that pleasure craft with permanently installed toilets may not discharge sewage. Included are pleasure craft in Swedish territorial waters and Swedish pleasure craft in other territorial waters. Swedish pleasure craft in waters under the jurisdiction of another Government, which permits such discharge, may discharge its sewage.
- A design requirement stating that all pleasure craft with permanently installed toilet shall be fitted with a tank offering the possibility of suction discharge to shore reception facilities. Pipes leading directly from the toilet to the sea are not allowed.
- A clarification of the requirement that all pleasure craft harbours shall have reception facilities which can take the waste that needs to be discharged from visiting craft. This may include land based toilets, waste water basins, and suction discharge facilities, in case such discharge is needed.

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The conclusions at which the Swedish Transport Agency have arrived indicate four main arguments as to why prohibition of discharge of sewage from pleasure craft should be introduced. These could be outlined as:

- The legal argument
- The environmental argument
- The aesthetic, hygienic and sanitary argument
- The ethical and moral argument

The legal argument means that Sweden already today is bound to introduce prohibition of discharge in national law, and due to the fact that the discharges have not ceased by voluntary actions, the introduction of more forceful regulations is necessary.

In Sweden no statutory prohibition against discharge of sewage from pleasure craft exists today, in spite of the fact that we have committed ourselves by the Helsinki convention to implement such a prohibition in national law. The members of the HELCOM convention have agreed that all sewage that may not be discharged at sea must be discharged ashore and that the member states must see to it that reception facilities are available.

In addition, within the frame work of HELCOM, the Ministers for the Environment of the Baltic coastal states and the European Commission decided in November 2007 on a common action plan, the so called Baltic Sea Action Plan (BSAP). The plan includes the Baltic Proper, the Sound and the Kattegatt, and its objective is to attain a good ecological status in these water areas by the year 2021.

The environmental argument concludes that sewage from pleasure craft should be considered an environmental problem.

Discharge of sewage from pleasure craft causes inter alia pollution inputs to the water from nitrogen and phosphorus substances as well as bacteria. The discharges of phosphorous pollution from toilets onboard craft in Swedish waters is estimated to correspond to 3.7 tons of phosphor, which constitutes 13 per cent of the urine and faeces produced by the pleasure craft people. The discharges of sewage from pleasure craft take place during a season when the Baltic is extremely sensitive and are intense during a short time of the year. In the Baltic phosphor is a greater threat to the environment than nitrogen and the sea is particularly sensitive to both eutrophication and the existence of hazardous substances such as algal blooms.

In the Swedish administration of the project and following the Water Directive a general non-deterioration requirement is set in force, stipulating that a water area

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must not deteriorate once the area has reached the status aimed at. The areas bordering on the Baltic Proper may be considered more sensitive to discharges of sewage as also the Skagerrak, the Kattegatt and the Sound. This includes also lakes and internal waters in the vicinity of these coasts, for which prohibition is proposed for two years after a formal decision has been made. The coasts along all Gulf of Bothnia are today in general less sensitive to discharge of sewage, but also that area shows that the environmental status is not free from problems, and here the prohibition is proposed to last four years after the decision.

The analysis of national finances shows that the costs for prohibition against discharge of sewage from pleasure craft is not on a level with the benefit from a coastal/Baltic Sea perspective. However, the Swedish Transport Agency mean that the prohibition instead must be regarded from the viewpoint of the benefit that a prohibition would have upon the local environment.

The aesthetic, hygienic and sanitary argument means that stays in the vicinity of local discharges of great quantities of sewage are considered unpleasant, unhealthy and aesthetically unattractive.

According to the Water Directive the water at the shore must reach a certain approved level to be good enough for bathing without risking ones health. At shores where a great number of pleasure craft stays during peak season the quality of the water may become so poor due to the discharges, that bathing may be injurious to health. Raw sewage discharged in the vicinity of bathing water may cause sanitary problems if the concentration of contagious bacteria and virus in the water become high enough. Via wounds or swallowed water the sewage may cause infections in stomach, intestines, ears, nose, throat and skin.

The Boating Life Investigation made in 2004 showed that there were about 720 000 privately owned pleasure craft in Sweden at that time. The majority are of the type small open daytrip boats. The number of pleasure craft offering sleeping accommodation is about 160 000. Approximately 80 000 out of the 720 000 craft are estimated to have some type of toilet on board, and only 13 per cent of these have got a tank and suction discharge facility. In the perspective that the sewage discharge issue comprises also land based toilets every owner of pleasure craft is included in the inventory of actual need.

The ethical and moral argument means that based upon the unsuccessful attempts made to reduce the voluntary discharge of sewage from pleasure craft more effective methods are now needed in order to achieve a change of attitude in society.

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When a sufficient number of shore based toilets, waste water basins and suction discharge facilities is available, the craft owners' problem to leave the sewage ashore will be solved and hopefully they will then act in accordance with the proposed prohibition. The inventory of reception facilities initiated by the Swedish Transport Agency shows that there are presently 451 dry closets/earth closets along the coasts, on islands/islets and in natural harbours available. The inventory also shows that in guest harbours and club harbours there are 105 suction discharge facilities, whereas no natural harbour offers such facilities today.