

## **EBA Position Statement Black Water Management**

### **Executive Summary**

The European Boating Association<sup>1</sup> (EBA) supports action to reduce the direct pumping out of black water into the environment. However, actions to support this must ensure that adequate provision is made for boaters to empty their tanks, and allow for movement between countries that have different rules.

### **Background**

There are increasing concerns regarding the pumping of raw sewage into waterways and inshore around the coast. Pollution of water has impacts on human health, and can also impact on the health of shellfish and other wildlife populations. Most inland waterways already ban the discharge of sewage, and guidance for coastal vessels is only to discharge well offshore.

Boaters do not wish to pollute the environment in which they undertake their recreational activities. However, facilities need to be provided so that they can regularly pump out any holding tanks at reasonable cost<sup>a</sup>. On larger recreational boats black water could be treated on board before discharge if suitably sized, reliable and affordable equipment were available. The EBA would welcome the development of such equipment. The competent authority would need to indicate the standard treated water needed to meet.

### **Recommendations**

To support recreational boaters in complying with anti-pollution measures, the EBA recommends that national environmental agencies ensure:

- Effective consultation with their national boating federation(s) prior to introduction of any new regulations.
- Workable and simple to use collection facilities
  - Fixed location installations need to be accessible to all boats with due regard given to length, draft and manoeuvrability.
  - Portable machines are often difficult to move and too complicated to operate.
- Affordability for provider and user

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<sup>a</sup> The Recreational Craft Directive, Directive 2013/53/EU requires that any toilet fitted in a recreational craft is connected solely to a holding tank system or water treatment system.

- Adequate provision of affordable facilities to deal with black water pump-out before any enforcement actions are considered.
- Adequate provision of shore-side toilet facilities to reduce the capacity requirements for holding tanks.
- Clear communication of requirements, especially for those who travel across borders.
- Flexible interpretation of requirements for boaters crossing borders, such that requirements are not so onerous as to prevent travel.
- Consultation between neighbouring countries to ensure technical requirements are consistent and do not require costly changes on board when travelling across borders.
- Simple solutions. We have seen proposals for geo-fenced valves with communications systems to tell regulators when and where a boat has pumped out. Simple locking and marking of valves should suffice with allowances made for seals to be broken when outside regulated waters.

## Conclusion.

The EBA supports measures to prevent pollution. However, it is important that any regulations take proper account of the needs of boaters, and of the practicalities of implementation of any on-board measures. Cross-border movement of recreational boats leads to the need for flexibility in interpretation of any requirements imposed.

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## Notes

### <sup>1</sup> **European Boating Association**

The European Boating Association, Europäischer Sportschiffahrtsverband, Association Européenne de Navigation de Plaisance, is a civil, not for profit association of recreational boat users' organisations, founded in 1982, and established as an Unincorporated Association whose members agree to be governed by its constitution. The EBA member organisations (see <http://www.eba.eu.com/participantorgs>) collectively represent in excess of 1.5 million recreational boaters and an estimated 20 million active participants.

The purpose of the EBA is to represent the mutually agreed common interests of national recreational boat users' organisations in Europe, and in particular to:

- Coordinate and develop recreational boating activities in Europe by exchange of information, and action on matters of mutually agreed common interest.
- Promote the practice of all activities on the water, promoting and exchanging knowledge and experience between recreational boat users' organisations in Europe.
- Represent EBA members in environmental, regulatory and technical matters affecting their safe enjoyment of recreational boating activities on the water.
- Encourage the safe, unhampered and environmentally sustainable use of recreational boats on all European waters.
- Provide the link between the European institutions and EBA Members for consultation and information on proposed EU directives and regulations.

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- Provide the link between other relevant global and regional organisations and EBA Members.

## **Recreational Boating**

The EBA is the European representative organisation for recreational boating.

There is no general consensus as to the terminology used to describe the types of boat used for “recreational boating”, with expressions such as “recreational craft” or “private pleasure craft” being used to describe only subsets of such types of boat for the purposes of specific pieces of EU legislation. “Recreational boating” also includes the use of beach- or slipway-launched water toys such as wind surfers, sailing dinghies, inflatable boats and personal watercraft.

Boats used for “recreational boating” may be small or large, propelled by sail and/or power and used on inland waters and/or at sea. “Recreational boating” at sea can range from close-to-shore to trans-oceanic.

“Recreational boating” also includes the use of such boats privately owned and operated by the owner, hired (on bareboat or skippered charter) or used to provide a service (such as training or race participation).

In the context of this document, therefore, the EBA considers “recreational boating” to mean using boats that are designed or adapted for sport or leisure, whether propelled by sail and/or power, for the purposes for which they are designed or adapted.