

EBA Position Statement Hull Fouling

Executive Summary

The environmental impact of invasive species is of great concern for all kinds of waterbodies around the globe. Invasive species may cause reductions in biodiversity and ecosystem resilience, with resultant effects on communities' livelihoods and well-being. The risks associated with invasive species will also be increased by the changing climate, as species move and are able to colonize new environments.

Hull fouling is regarded as a contributor to the spread of invasive or alien species and the issue is being addressed on a global scale by international organisations like the World Ocean Council (WOC) and the International Maritime Organization (IMO). The proposed actions focus on shipping and the marine industry, where improvements are being sought in biofouling management. Apart from prevention a lot of effort is being put into research and development to create more effective antifouling applications.

Within the European Union the "Biocide Directive" stipulates strict limitations for the use of biocide components that may be used in a wide range of products; among them anti fouling applications.

The European Boating Association¹ (EBA), being aware that the hull fouling issue is equally applicable to Recreational Boating², is concerned that the currently available antifouling products that are permitted within the set limitations are ineffective to prevent hull fouling and introduce a higher risk of spreading alien aquatic species. As hull fouling also reduces a boat's performance, ineffective control of hull fouling will also increase the need for in-water cleaning..

The EBA urges regulators to take steps to mitigate the contradiction that is created between the Biocide Directive and the Global initiative to reduce the risk of introducing alien aquatic species by hull fouling.

Background

Since the first Sustainable Ocean Summit in 2010, the WOC has worked to focus attention on action to address biofouling, including its potential to serve as a vector for the introduction of invasive species and the significant threat to ocean biodiversity that this can pose. The main purpose is to identify what actions can be taken to manage biofouling and mitigate the threat of invasive species.

A major international initiative to address biofouling - the GloFouling Project – is now being launched with WOC as the lead implementer for engaging ocean industry action with and through key organizations. The GloFouling Project is a partnership of the Global Environmental Facility, United Nations Development Program, IMO, and UNESCO Intergovernmental Ocean Commission.

The GloFouling Project will develop and put in place strategies to ameliorate biofouling, particularly in partner countries around the globe, relying largely on the development of public-private partnerships.

The development of innovative coatings that control biofouling on ships, offshore structures, and other key infrastructure involves not only technical research hurdles, but producers also face a host of regulatory challenges in bringing these products to market. Coatings researchers must balance the requirement for products that not only control biofouling effectively, but which do so in a way that is cognizant of the need to minimize ancillary environmental damage, including harm to other species that are not implicated in fouling. In this way, coatings scientists must balance the need for effective treatments while avoiding harm to the marine environment.

At the OSPAR – Environmental Impact of Human Activities conference in April 2018 hull fouling was addressed as a potential threat and a consultant contracted by the Netherlands Government presented a paper on hull fouling found on pleasure craft and its relation with alien species found both on these boats and the pleasure craft harbours on the coast of the Netherlands.

The EBA and its members have long been engaged in action to increase public awareness about the risk of unintentional spreading bio fouling by having maritime growth attached to parts of recreational boats when these are being transported or sailed from one area to another. This has resulted in a publication; “the European Code of Conduct on Recreational Boating and Invasive Alien Species” by the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) in November 2016.

The European Commission is committed to developing a European Union (EU) strategy to address the challenges and opportunities for Coastal and Maritime Tourism (CMT) in the EU, with a view to developing the EU as the world’s premier destination for CMT. This must include Yacht Tourism in addition to cruise ship tourism. In its position on CMT the EBA states that:

The EBA in principle supports the development of an EU strategy to address the challenges and opportunities for Coastal and Maritime Tourism in the EU, the purpose of Written Declaration 0033/2012 and the adoption and recognition by individual state governments, not only those of EU Member States, of any initiative that boosts nautical tourism, particularly those that facilitate unhampered movement on the territorial seas as a prime enabler for Yacht Tourism.

The European Commission has also provided strict regulations on production and application of antifouling.

The EU biocides directive sets the upper limits and each EU Member State makes its own national regulations within these set limits.

The Recreational Boat Owner's Perspective

Sea going recreational boats may sail significant distances on their own keel and depend on effective ways to avoid hull fouling. As hull fouling not only endangers the environment but also hampers a boats performance (speed/ fuel efficiency) it is of prime interest to manage hull fouling.

The recreational boating community has a great affinity with the marine environment and has shown its ability to adapt to new regulations and requirements with great flexibility and determination. It is in a recreational boater's interest to sail in a clean and sustainable environment.

Effective ways to avoid hull fouling are of prime importance both for the boat and the environment.

National regulations within the EU show great variety and have resulted in ineffective products that are now legally allowed and available, with severe hull fouling as a result mainly on the "salt" water applications. It is incomprehensible that effective products are available and may be used in one EU Member State but not in the other. It is equally incomprehensible that existing and effective products in some EU Member States may be used for "professional" shipping applications but not for recreational boats. Apart from the fact that they float in the same waterbody recreational boats will tend to spend fewer hours underway and therefore have a greater tendency to be effected by hull fouling.

The EBA Position on Hull Fouling

The EBA is of the opinion that the current situation where legal limits set by the biocide directive and even stricter adherence of these limits by certain Member States has created a range of ineffective products that may be used for recreational boats with significant increase of aquatic hull fouling as a direct result, thus introducing a new path for the spread of alien species.

The EBA is committed to informing the recreational boating community about the risk of spreading alien aquatic species when hull fouling occurs. At the same time EBA will advise recreational boaters that they should clean their boats before they undertake long journeys in order to avoid the above mentioned risk even if this means in water cleaning; in water cleaning in the home environment should only remove natural species.

The EBA believes that regulators should take steps to mitigate the contradiction that is created between the Biocide Directive, leading to ineffective antifouling applications available for recreational boating, and the Global initiative to reduce the risk of introducing alien aquatic species by hull fouling. The EBA opposes the split in regulations regarding use of products between professional shipping and recreational boating.

The EBA is supportive of efforts to develop effective alternatives to traditional methods of controlling hull fouling.

Notes

¹ 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.
- Provide the link between other relevant global and regional organisations and EBA Members.

² 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.