

Brief summary of the Impact Assessment

Consequences for the industry

For the shipping companies, there will be costs associated with establishing and implementing a plan for handling hull fouling for the specific ships and mobile units.

However, it is well documented that shipping companies are currently concerned with minimizing fouling through the use of anti-fouling systems, hull design and possible hull cleaning, due to economic gain. The Norwegian Maritime Authority therefore considers that the industry is already well acquainted with the management of fouling. As there is already practice for shipping companies to manage fouling, the Norwegian Maritime Authority assumes that the proposed rules will only entail economic consequences of a relatively modest magnitude in terms of the administrative work of establishing and implementing a plan for handling hull fouling.

Hull cleaning will involve a cost for shipping companies. Cleaning is carried out at different intervals depending on the degree of fouling, which in turn is influenced by the waters in which the ship or mobile unit has operated. The costs will therefore vary depending on where the ship or mobile unit operates, as higher degrees of fouling may occur in some places.

It is also important to point out that there are currently few providers of fouling cleaning services. In the initial phase, the availability of such services may be limited, which may mean that the costs associated with these services may be somewhat higher.

There is also reason to expect that the regulations will result in increased costs for shipping companies when removing fouling in Norwegian waters. This is particularly due to the requirement to use the best available technology, which may be more costly than other methods.

Consequences for the authorities

For the authorities, the proposed rules will entail an increased workload in the form of supervision. There is currently no formalised regulation for hull fouling, and monitoring compliance with this regulation will therefore constitute a new area of responsibility for the Norwegian Maritime Authority.

In connection with the consultation, it is important that the authorities ensure that updated information on alien species is available on relevant websites. This will contribute to a smoother introduction of the regulations. In an introductory phase, guidance on the regulations is also necessary, while it will also be

necessary to build up both expertise and capacity when it comes to supervising the regulations. This will require resources for the Norwegian Maritime Authority.

The Norwegian Maritime Authority shall not approve plans that are on board, but they will have the opportunity to check that such plans exist and that the plan contains measures and procedures related to fouling management. The documentation on board will not be approved, but it is possible to check during inspections.

The details of how inspections of ships and mobile facilities are to be carried out in line with the regulations for the management of fouling on hulls need to be clarified further. There are more than two years between the adoption and entry into force of the regulations, which provides time to assess how the supervisory authority will more specifically relate to the regulations and follow up on requirements and any violations.

For inspection of biofouling on ships and mobile units, training of inspectors is necessary, as those who carry out inspections do not necessarily have knowledge of the alien species that exist today, since this is a new regulatory framework and inspection area. The regulations distinguish between micro- and macro-fouling, and although the difference is often clear - where one is a slime layer where the hull is not particularly covered, while the other consists of larger organisms - there are nuances that can be difficult to distinguish, especially in connection with inspections.

The regulations will therefore require the establishment of a training program for inspectors to ensure consistent assessment of fouling on hulls. As part of the training program, information must be provided on what to check, how to do it, and how thorough the inspection should be. The Norwegian Maritime Authority believes that this will have significant financial and administrative consequences for the authorities.

It must nevertheless be emphasized that the introduction of new regulations for the management of hull fouling is the result of thorough consideration. The costs associated with the introduction of the regulations, for all parties involved, are assumed to be a necessary investment to achieve the desired environmental effect.