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Sendt: 31.05.2024 13:36:09
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Kopi: Niels van de Minkelis | KVNR[Minkelis@kvnr.nl];
Tittel: 2024/20963? - Reaction to the consultation of the proposed regulation on the handling of hull biofouling

Dear sir/madam,

Hereby I send you input for the proposed regulation on the handling of hull biofouling.

The KVNR bureau has identified four critical concerns regarding the draft regulation on hull biofouling treatment for ships and mobile installations:

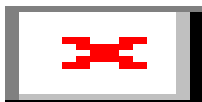
1. The required plan, including the Biofouling managementplan and recordbook, precedes IMO legislation. KVNR bureau foresees additional administrative burdens as a result. The KVNR requests that the NMA awaits the IMO's mandatory requirements.
2. Additionally, the question arose what organisation should to verify this specific plan?
3. The inspection interval stipulated in the draft regulation differs from the IMO 2023 Biofouling guidelines, potentially causing unnecessary confusion. The KVNR recommends adhering to the IMO standards.
4. The requirement for in-water cleaning methods that capture biofouling depends on the availability of such services. The KVNR asserts that this obligation is reasonable only if sufficient services are available in each port.
5. Clear criteria are necessary for the NMA's orders for immediate biofouling removal to ensure consistent and fair enforcement.

In case you have any questions or comments regarding our concerns, please let me know.

Met vriendelijke groet | Kind regards,

Anouk Henkelman
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