Wallenius Wilhelmsen

Sjøfartsdirektoratet,

v/ Linda Dehlin Fluvåg

via post@sdir.no

Oslo , 06.06.2024

Comment on proposed regulation concerning management of hull biofouling, case number 2024 / 20963-1

Dear Ms Dehlin Fluvåg,

I'm writing to you on behalf of Wallenius Wilhelmsen, a global leader in integrated vehicle transportation and logistics with head office in Lysaker, Akershus. As a ship owner – operator we control a fleet of ca. 125 deepsea roll-on roll-off (RoRo) vessels that service 15 trade routes to six continents.

Wallenius Wilhelmsen is a liner shipping company which means we buy our fuel directly and factor it into the rate we offer to the market. Fuel is the single largest item in our cost base, we have a direct, central and permanent focus on operational and fuel efficiency it represents nothing less than the basis of how we compete.

One of the most rewarding areas for improving operational efficiency over the last decade has been our investment and innovation concerning hull fouling management. It is a topic where our environmental and economic interests are in perfect alignment.

In addition to testing all types of hull fouling systems and managing their application very closely, we still conclude that in water hull cleaning (IWC) is an indispensable part of a fleet hull fouling management approach. Aside from that rare operational circumstances can overwhelm even the most sophisticated coatings, we also have limited influence over the choice of hull fouling for the one third of our fleet that we charter in.

We have had a pioneering approach to IWC. In 2014 we presented our annual USD100k 'Orcelle Award' for sustainable innovation to ECOsubsea, a prominent Norwegian IWC solution provider. Furthermore, we helped them get a foothold in Southampton, UK, one of our hub ports. Today their solution is in wide use across our fleet. However, though our use of advanced data analytics, we could see that over-consumption is still a factor for vessels that for various reasons cannot access the berth-based IWC solutions as frequently as would be ideal. That prompted us to explore and invest in hull-skating type ICW solutions that are vessel mounted and can, therefore, be used frequently. Our operational data indicates that that solution, combined with a hard coating that can

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tolerate frequent skating without degradation represents the highest possible level of hull fouling control, and therefore also the minimum possible of related GHG and criteria emissions.

In view of our deeply committed approach to hull fouling management, the subject regulatory proposal gives us two principle concerns. First, invasive species risk through the hull fouling vector is, by definition, a global challenge. Therefore the most effective regulatory approach must also be global. The International Maritime Organisation has been very focussed on the topic and we would strongly urge the Norwegian IMO delegation to leverage it's leadership standing to ensure progress continues towards IMO regulatory measures to govern hull fouling. Acting unilaterally will inevitably result in conflicting requirements and unnecessary compliance complexity. The sum of the parts would be less than the sum of the whole.

Our second concern is already evidenced by the aspect of the proposal that would effectively always require capture of what is removed from the hull cleaning process. That is contrary to the guidelines recently adopted by IMO. Moreover it is a measure that is contrary to the advice of marine biologists and environmental non-governmental organisations, as well as running afoul of the IMO's longstanding principle of solution agnostic regulation.

To conclude, while we wholeheartedly support the Norwegian attention to this important environmental aspect of international shipping, we strongly urge a reorienting of the focus towards IMO and global, binding regulatory control measures.

Best regards,

Wallenius Wilhelmsen ASA

Roger Strevens

VP, Regulatory & Environmental Affairs