[Name, title — competent authority / Ministry, country]

Or

European Commission, Directorate-General for Health and Food Safety (DG SANTE)

***To**:*
Mrs Almut Bitterhof
Mr Ludovic Chatelin

For distribution to Member States via Circabc

EUROPEAN MARITIME INDUSTRY AND INTERNATIONAL MARITIME SUSTAINABILITY OBJECTIVES UNDER THREAT

We write on behalf of [association, vessel owner or operator, stakeholder — to adapt on the type of co-signatories] to engage actively in the ongoing evaluation of biofouling control or antifouling solutions and to raise the concerns below within the Standing Committee on Biocidal Products (SCBP).

Current approaches by European and national chemical regulatory authorities are set to undermine Europe's maritime strategy, weaking competitiveness and jeopardizing International Maritime Organisation (IMO) decarbonization objectives as well as stricter macrofouling rules. Urgent action is needed to temporarily suspend current practice, to ensure informed decision-making and to recognize the strategic role of shipping for Europe.

Effective biofouling management is a critical enabler of the European maritime industry and IOM decarbonization objectives and a prerequisite for meeting upcoming stricter macrofouling rules. The performance, safety, and efficiency of the shipping sector are therefore directly dependent on the availability of effective biofouling control solutions. Without effective antifouling solutions, maritime vessels experience increased hydrodynamic drag, significantly higher fuel consumption, elevated greenhouse gas emissions, accelerated material degradation, and rising operational costs. Consequently, **removing robust biofouling management technologies from the market undermines EU's policy-driven agendas and ability to meet IMO decarbonization objectives and stricter macrofouling rules**. In practical terms, European and IMO ambitions related to environmental performance and economic strength cannot be achieved if the maritime sector is deprived of the technologies necessary to operate efficiently and sustainably.

At the same time, European and national chemical regulatory authorities are set to significantly reduce the availability of biofouling control technologies. In particular, ongoing assessment processes under the EU Biocidal Products Regulation (BPR)[1] are increasingly oriented towards elimination of well-established and effective technologies. There is a significant risk that decisions will be taken at a high policy level, **based on limited information only and without a sector-wide perspective**. Such decisions would effectively remove available antifouling products removed from the EU market. The resulting loss of these products would have **immediate and far-reaching consequences**; EU maritime industry and IMO decarbonisation objectives as well as macrofouling

[1] According to the Biocidal Products Regulation (EU) No 528/2012 for product type 21 (Antifouling Products)

control targets would no longer be achievable in practice. **Taking decisions without considering the wider needs of the sector will be damaging to maritime industry and sustainability strategies.**

Thus, there is an urgent need to re-think both the procedures and the overarching approach to the assessment of marine antifouling products as currently practiced. Whilst we fully support the level of protection the BPR is designed to deliver for health and environmental safety and the drive to more sustainable antifouling solutions, a purely case-by-case evaluation of existing technologies does not adequately reflect the functional reality of antifouling technologies nor the interdependence of available biofouling control solutions. For new, potentially more sustainable solutions under consideration **technical and economic feasibility needs to be confirmed and consideration given to timescales required to make such new technologies available, get established on the market and genuinely exist at operational scale.**

We respectfully but urgently call on EU Member States and the European Commission to take the following steps:

- **Suspend antifouling-related BPR approval and renewal decisions** until a comprehensive, evidence-based and holistic assessment framework for biofouling control technologies is established across relevant EU policy frameworks**.** This is essential to support maritime decarbonisation, protect marine biodiversity and ensure coherence between industrial, climate and chemicals policies.
- **Ensure that no existing antifouling solution is withdrawn unless its functionality can be effectively replaced.** Different technologies, including Medetomidine, Zinc Pyrithione, Zineb other chemical and non-chemical solutions under review represent distinct and complementary modes of action. They should not be withdrawn without full consideration of what is lost and confirmation that alternatives are technically and economically feasibile, established on the market and genuinely exist at operational scale.
- **Incorporate real-world operational experience into regulatory decision-making.** The regulatory assessment must reflect the diversity of real-world conditions: different vessel categories (commercial, pleasure craft, aluminium-hulled), different geographic fouling pressures across European waters, trading patterns, and performance requirements across the global maritime fleet . A conclusion valid for one context is not automatically valid for all.

We thank you for your attention and trust that you will give this matter the urgency it deserves.

Yours sincerely,

Co-signatories:

[List of co-signing organisations, companies and individuals — appended from petition]

Total signatories: [NUMBER] professionals from [NUMBER] organisations across [NUMBER] countries representing [NUMBER] employees and [NUMBER] associations across the EU.

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