

BIOFOULING REQUIREMENTS FOR VESSELS ARRIVING INTO NEW ZEALAND

We have received the following update from MPI on the biofouling requirements introduced in May this year.

On 15th May, the Craft Risk Management Standard for Biofouling on vessels arriving into New Zealand (the CRMS), came into force. The CRMS aims to reduce the biosecurity risks associated with vessel biofouling, by requiring vessels to take preventative measures and maintain a clean hull before they arrive into NZ.

The enforcement date marks a transition over the last four years, where vessels were encouraged to comply voluntarily, to one where arriving vessels must carry documentation showing one of the three measures in the standard has been applied.

These measures are:

- a) Cleaning the hull within 30 days prior to arriving in NZ and providing MPI with documentation of that clean; or
- b) Conducting continual hull maintenance using best practise, such as IMO biofouling guidelines, and providing MPI with documentation of that management; or
- c) Conducting hull treatment using a MPI-approved provider within 24 hours of arriving in NZ and providing MPI with documentation of the scheduled treatment.

MPI advises all owners, operators and charterers of vessels arriving into New Zealand to familiarise themselves with the [Guidance Document](#) accompanying the CRMS, and the [Frequently Asked Questions](#) fact sheet, available on the MPI website.

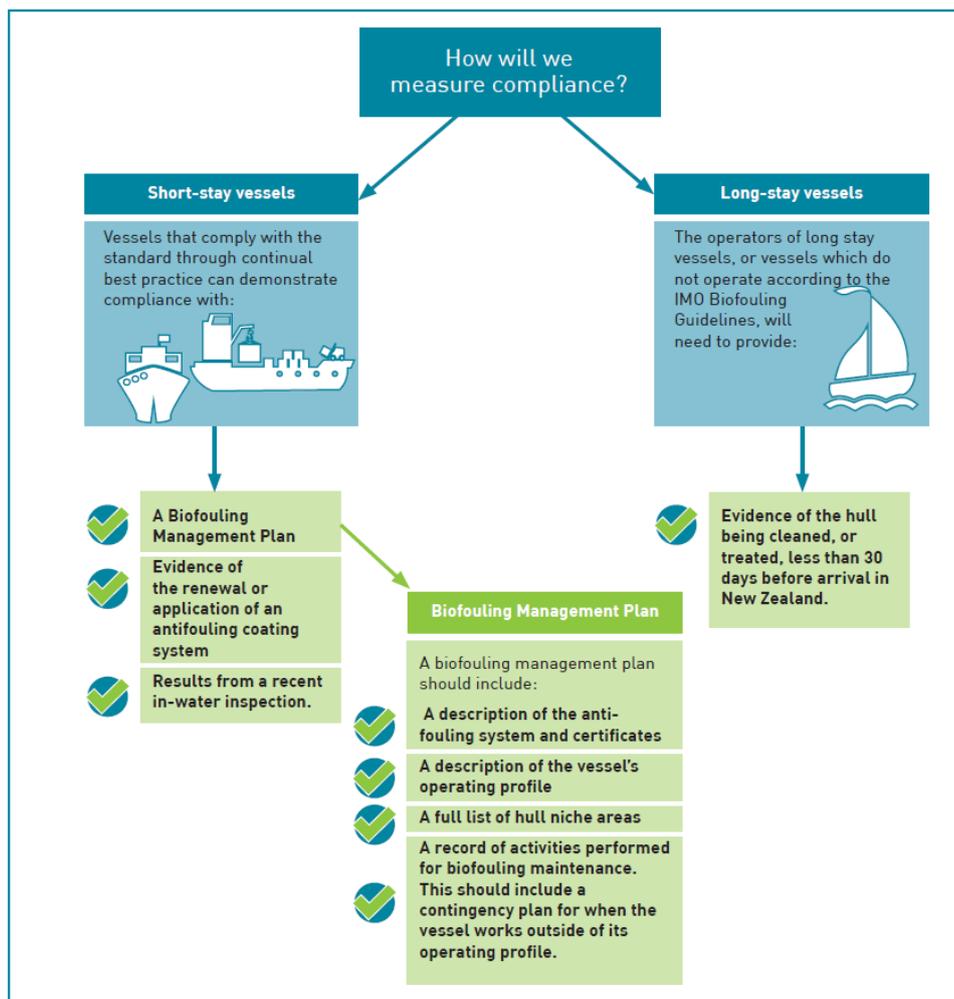
HOW DOES MPI MEASURE COMPLIANCE?

MPI wants the risk of biofouling to be managed offshore. This means MPI are assessing compliance based off documentation and records that show vessel operators have done one of the three measures to meet the biofouling standard. The type of documentation MPI expects to see, will depend on the measure used to meet the standard (i.e. best practice or cleaning before arrival).

For commercial vessel operators, the easiest way to comply is to manage biofouling continuously, and have evidence that this has been done. Continual maintenance involves ongoing management of biofouling, including:

1. Applying antifouling system coatings to the hull and niche areas of your vessel. It is important to choose a paint that matches your operational profile of your vessel.
2. Monitoring the performance of your vessel and performing in-water inspections and cleaning when performance begins to decline.
3. Operating within the specifications of the antifouling system coating.
4. Proactive grooming of the slime layer – cleaning the slime layer often will prevent larger organisms from settling and will allow the antifouling paint to be more effective.

5. Having **contingency plans** (such as in-water inspections and in-water cleaning) for when your vessel falls out of its operational profile or the paint is damaged (repair should be applied if the antifouling system is damaged, even if it is minor).
6. Renewing antifouling coatings within the specified service life.
7. Treating pipework and sea chests or using Marine Growth Prevention Systems to minimise biofouling growth.



It is important to carry records of how your vessel has been maintained by developing a Biofouling Management Plan (BFMP) that details the procedures for managing biofouling for that vessel. It is also important to maintain a Biofouling Record Book (BFRB), which logs all biofouling maintenance activities undertaken by the vessel.

WHAT IS THE DIFFERENCE BETWEEN THE “RISK PROFILE” OF THE VESSEL, AND COMPLIANCE WITH THE STANDARD?

Under the CRMS, vessels are risk profiled by the team at the Intelligence and Targeting Operation Centre in Auckland, based on pre-arrival information submitted to MPI, and assigned a risk rating of low, medium, or high risk. This does not mean the vessel is non-compliant, more that it has high risk indicators, for example, an older antifouling coating, a number of extended port stays, or the class of vessel is higher risk (tugs, barges, etc.). A portion of vessels from each risk category are then randomly selected for document audit, with the proportion of vessels selected increasing with increasing risk. Vessels which fail the document audit are referred to border staff for further verification, and if still unable to produce evidence of compliance, action may be conducted to manage the risk.

Irrespective of the risk profile of the vessel, all owners and operators of vessels should ensure that the right documentation is on-board, or easily accessible so that it can be produced when MPI requests it. More information on what kind of documentation commercial vessel operators should carry is below.

WHAT CAN IMPORTERS, EXPORTERS AND CHARTERERS DO TO MAKE SURE THE VESSEL WILL COMPLY/

1. Make sure the vessel is carrying verifiable evidence that one of the three measures has been undertaken, such as:

- Antifouling certificates, including information on antifouling coating (AFC) application date, type of antifouling applied and if it is applied to niche areas.
- Reports from a recent hull and niche area inspection, with photos/video.
- Reports from the most recent cleaning of the hull and niche areas, with photos/video
 - [See guidance on what MPI expects in a hull inspection report.](#)
- Records of contingency planning if a vessel falls out of its operational profile.
- Biofouling Management Plan and record book.
 - See guidance on [Biofouling Management Plan Guidance.](#)

The information included within this documentation should be sufficient to show that the vessel has carried out one of the three measures outlined in the CRMS. For example, a vessel may carry a Biofouling Management Plan and Record Book; however, if these documents are audited by MPI and do not show records that biofouling on the vessel has been managed, then the vessel will not meet the requirements.

2. Request the ship broker chartering the vessel conducts a risk assessment on the vessel before it is hired.

- MPI has produced a guidance document on how to risk profile a vessel. This can be found [here](#).
- If the vessel being chartered comes out with increased risk, make sure the operator takes steps to manage biofouling prior to arrival.

3. Include clauses/agreements in the charter that the vessel owner or operator will manage their biofouling to meet the Craft Risk Management Standard for Biofouling.

- This puts the responsibility onto the operator of the vessel to know how the vessel is managed.

WHAT ROLE DO IMPORTERS AND EXPORTERS PLAY?

Importers and exporters chartering vessels have an important role to play in making sure the vessels used to carry this cargo do not pose an undue risk to New Zealand's marine environment.

In all situations, it is important that the operator of the vessel you are hiring to carry your cargo has conducted offshore maintenance of the biofouling. It is just as important that the operators retains documentation of this.

All documentation carried on board a vessel may be subject to MPI verification at any time.

If these forms of documentation are carried on-board each vessel, then it is less likely MPI will need to carry out physical verification of a vessel's hull, such as costly dive inspections, or further verification with the agent or master of the vessel, which may cause delays and incur additional costs.

If you have any questions, please contact standards@mpi.govt.nz