

Report summary 2018

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SUMMARY

**ENVIRONMENTAL RISK
MANAGEMENT AND SUSTAINABLE
USE OF ANTIFOULING PRODUCTS**

Finnish Safety and Chemicals Agency

tuukes



1. INTRODUCTION

Finnish Safety and Chemicals Agency (Tukes) started a project on sustainable use of antifouling products (AF products) in 2017. Project was funded by Ministry of the Environment, and Tukes. The aim of the project was to promote the sustainable use of pleasure craft AF products in Finland. During the project general principles for AF product environmental risk assessment to be done in the coming years in Finland were created in order to ensure the sustainable use of biocidal products and high level of environmental protection. The final report of the project was published in February 2018 and it is available in Finnish¹ in Tukes website. Therefore, English summary of the report is presented various methods to reduce the risk from the use of AF products and ideas, how to promote the use of alternative AF methods. In this document it is presented the main proposal of actions from the report.

2. BACKGROUND

The current use of AF products is unsustainable. Wide use of AF-products has caused contamination of soil and sediment in marinas due to accumulation of permanent substances like copper and zinc to the soils and sediments. Based on environmental exposure scenarios most of AF paints cause risk to the environment, for organisms in marinas. It has been noted that protection of marinas and their surrounding areas is important. Actions should therefore be taken to reduce the risks of the use of AF products.

Alternative AF methods are developed during the last years. Today several alternative methods to protect and keep the boat hull clean exist and the use of AF products is not so necessary than before. Nevertheless, alternative methods are not widely used, and their availability is weak for example there is only one brush washing stations suitable for sailing boats. The total ban of AF products is not a realistic option for now. However, at the moment it is necessary to promote the use of alternative methods and try to minimise the harms from AF products.

3. Proposal of actions of Tukes

Tukes should approve products with low leaching rate of copper, only. Thus, the total load of copper from AF-products will decrease and the risk for organisms will be lower than before. Results from efficacy tests conducted in the CHANGE project and experiences of low copper content products show that sufficient efficacy in the Baltic could be attained with lower copper leaching rate. That information should be taken into account and overly effective products should not be approved.

Besides, restriction of copper leaching rate in AF products other actions are needed in order to decrease the use of AF-pleasure craft products and promote the use of alternative methods. Certain restrictions as the ban of use of AF products in inland waters are still valid, but new risk mitigation methods and actions should be developed also. The most important actions to reduce the risk involved in the use of AF-products are presented below. Many of these actions need more further investigation and cooperation with other authorities and stakeholders.



3.1 Proposal of actions

1. Tukes will use Excel Tool Baltic scenario in the national AF biocide product risk assessment and authorisation and promote the harmonisation of the environmental risk assessment in the Baltic Sea.

Justifications: Excel Tool Baltic scenario is considered sufficiently protective for the Finnish conditions and it ensures the high level of environmental protection. The use of Excel Tool will promote the harmonisation of the risk assessment of AF products and facilitates mutual recognition of the biocidal products.

2. Tukes will restrict leaching rate of copper in the future approval of the AF-products. AF-products with low copper leaching rate and low amount of copper will be only approved nationally

Justifications: According to the sustainable use of biocides (Article 18 of the Biocidal Product Regulation (EU) No 528/2012), the use of biocidal products should be reduced to a minimum. Efficacy tests made in the Change project (CHANGE) indicate that sufficient efficacy in the Baltic can be achieved with a steady state copper leaching rate of 2-3 $\mu\text{g}/\text{cm}^2/\text{d}$. This is supported by the experiences from the low copper content AF products already on market.

3. Tukes will require that the service life of the products shall be marked on the labels and user's manuals.

Justifications: This will ensure that the information and claims of the products given by applicants are sufficiently realistic and reliable. That will increase also the reliability of the environmental risk assessment and ensure that the products coming to the market are safe.

4. Tukes will investigate the possibility to restrict the service life of AF-products for one boating season (6 month)

Justifications: This will promote products with lower concentration of active substances. Also risks during boat maintenance phase will decrease when less amount of active substances is released to the environment. The practice is to paint the boats in every spring although it will not always be necessary.

5. Tukes will investigate the possibility to restrict the colour of AF products for only one conspicuous colour and raise the issue in the discussion with the stakeholders, industry and other MS.

Justifications: The restriction will facilitate the enforcement of AF-products. Cooperation between stakeholders and other MS is important in this issue.

6. Tukes will investigate the possibility to restrict the use of AF products for only boats not longer than 6 m.

Justifications: Plenty of alternative AF methods are available for small boats. Thus, the use of AF products is not necessary. Besides, a remarkable part of the boats consists of small boats, so if the use of the AF products can be decreased in these boats the load and risk to the environment shall be decreased also.

7. Tukes will increase communication and information distribution about AF products, alternative and risk mitigation methods. Multichannel communication campaign shall be arranged in cooperation with other authorities and stakeholders.

Justifications: Communication campaigns will increase the knowledge about AF products and their restrictions, influence attitudes, increase conversation and promote a proper use of the products as well as the use of alternative methods.

8. Tukes will develop and promote the enforcement of the AF products in cooperation with other supervisory authorities.

Justifications: Much harmful practices and practices against regulations are involved in the use of AF products. The enforcement of AF products has been very limited and it should be increased in order to increase knowledge of the consumers regarding the risks of AF use and to decrease risks into the environment.

9. Tukes will promote the environmental monitoring regarding concentrations of AF substances in marinas in cooperation with other authorities and research institutes.

Justifications: Information about harmful substances in marinas is limited. Monitoring data will be needed for the risk assessment and for assessment of risk mitigation methods.



Authorisation of AF products 2019

Protection goal of environmental risk assessment shall be tightened, and copper leaching rate shall be decreased

Products with higher risk shall be phased out from the market which decrease copper load into the environment about 60 % and environmental risks

Authorisation of AF products 2029

Environmental risk assessment criteria shall be tightened, even more

Copper products are replaced by other product

Environmental risks shall be decreased

Only AF products with certain colour are allowed to be on the market (sold and used)

AF products are allowed to be used on boats over 6 meters, only

Environmental risks of AF products decrease when proper working habits and waste treatment improve

The use of alternative methods is becoming more common when consciousness, supply and commitments increase

Implementation of communication and policy instruments outside Tukes

Increase of enforcement of the use of AF products

2030
alternative methods are prevailing practice