

Evaluation of Biocidal Products Regulation

EBI position paper

European Boating Industry (EBI) represents the recreational boating and nautical tourism sector at European level. The building of recreational boats, yachts and components together with a strong refit and repair sector are among one of the EU's success stories in the maritime sector. The vast majority of the over 6.5 million boats, their components and equipment in European waters are 'Made in Europe'. It is also closely linked to nautical tourism, which offers regional and high-value tourism on lakes, canals, coastal regions and islands. In total the sector counts 32,000 businesses, mainly SMEs, and over 280,000 jobs. Around 48 million people undertake water sports each year in Europe, the vast majority on small boats under 8 metres. Boating offers leisure and tourism opportunities, supports physical and mental wellbeing, and encourages a better understanding of Europe's seas, strengthening environmental awareness through direct experiences.

Boating is contingent on a clean marine environment, and boaters have a direct experience on the environmental challenges on the water. A clean marine environment is therefore critical to boating and the success of the sector.

Overall view on BRP evaluation

Biofouling is a significant contributor to the spread of invasive species harming biodiversity, increases fuel consumption and hence greenhouse gas emissions. Availability of effective anti-fouling products, including through biocidal products, is therefore essential. EBI supports the move to environmentally friendly coatings, innovative technologies and in-water hull cleaning where technically feasible. While this transition is underway, the availability of effective anti-fouling solutions is critical. EBI therefore highlights the crucial role of antifouling in supporting the competitiveness and sustainability of the sector. Decisions regarding the approval of substances must reflect relevant experience from industry and a thorough assessment of the socio-economic impacts. It should also consider the specific needs and challenges of recreational boating. In terms of the functioning of the Directive, approval and authorisation process, this must be reformed to provide certainty and ensure availability of products and encourage innovation. Action at national or regional level is accelerating and creating a risk of fragmentation that can lead to a lack of certainty for boaters and industry.

Sector-specific analysis and measures

Where specific sectors or uses are analysed, it is critical to provide sufficient data based on field studies and monitoring in close collaboration with the sector. Specific consideration should be placed on the boating-specific context with a mix of professional and DIY use. Risk assessment should rely on real-life scenario and consider socio-economic impact assessments. Data must, for instance, accurately reflect the number of boats and their composition within the boat fleet.

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