



Environmental Bulletin 13-2025: Biofouling updates- Brazil and Norway

Dear Environmental Contacts,

Good day,

There has been an increase in regulatory activity in biofouling regulations in two key regions, Brazil and Norway. These new requirements have an emphasis on cleaning with capture when macrofouling is present, however there are some differences between the two which will be listed below.

The Environmental Committee are working on reviewing these requirements and seeking clarifications where required.

Brazil

Following an increased interest in South American countries in terms of biosecurity management, Brazil has released a new set of environmental requirements with a focus on biofouling which also includes elements of ballast water (D-2 compliance and follows IMO requirements). The official regulation can be found [here](#), a non-official translated version is also provided [here](#) as it was clarified that a translated version was not expected to be released by the Brazilian Authorities.

The following is a summary of the requirements:

Key dates include:

17 June 2025: Increased biofouling identified within Brazilian water – reactive cleaning must take place and must be authorised by the Harbour Master or Port Captaincy.

1 February 2026: Full enforcement with penalties.

The regulation is aligned with the [IMO Biofouling Guidelines](#), except that this only applies to vessels above 24 metres in length, including those underway, anchored, or laid up within Brazilian waters.

A summary of the control points has been listed below:

- Biofouling Management Plan (BMP)
- Biofouling Record Book (BRB) – (maintained and kept for two years)
- Mandatory Inspections & Cleaning Protocols (Annual inspections; if monitoring this is then extended to 18 months)

- Periodic inspections of hull, niche areas (e.g., rudders, propellers), and internal seawater systems are required
- Cleaning must be performed during drydock or through authorised underwater methods
- Stricter requirements for inter-regional navigation.

As with the requirements proposed in the US Vessel incidental Discharge Act (VIDA), enforcement could differ depending on movement between specific zones within Brazil.

These biogeographic regions include the north, northeast and southeast-south.



Movement between these regions and incoming or outgoing voyages will be rated against the thresholds in the table below.

Biofouling Level	Estimated Coverage	Action Required
Light (acceptable)	Less than 1%	Transit permitted
Moderate	1% to 15%	Cleaning may be required before transit Reactive cleaning with capture
Heavy (critical)	Above 15%	Cleaning mandatory before transit Reactive cleaning with capture

If the vessel is found to have moderate or heavy levels of biofouling, reactive cleaning will be required before the voyage can continue – this practice is in force **with immediate effect**. All reactive underwater cleaning (non-scheduled) must be pre-authorised by the local maritime authority (Harbormaster or Port Captainty).

The request must include:

- a risk assessment;
- the cleaning methodology;
- environmental containment measures for removed debris.

Norwegian proposal

Norway has released a second proposal to introduce biofouling requirements – issued after its first proposal was rejected for being too stringent. The new proposal can be found [here](#).

A significant element of the requirements requires that any vessel identified with macrofouling will undergo hull cleaning immediately (within 24 hours) and the cleaning must not result in increased pollution or a higher risk of spreading non-native species. If this is the case, the cleaning must not be carried out in Norwegian territorial waters.

This implies a strong focus on cleaning with capture, where any captured material must be delivered onshore through either treatment facilities or reception facilities. The practice of only using cleaning with capture in Norway led to significant objections to the previous proposal.

The requirements are set to come into force on 1 July 2028. Although generally following the [2023 IMO guidelines](#) in terms of documentation and record keeping, the requirements largely go above these guidelines.

Distinction between transiting the through the Norwegian economic zone without calling a port In Norway will not exempt the vessel from these requirements.

The Environmental Committee will continue to review both the Brazilian and Norwegian Biofouling requirements along with further developments to regional requirements globally and their potential impact on the developing legally binding framework.

Best regards,
Secretariat team of the Environmental Committee.
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