

Marine Biosecurity Information Note 6

May 2025

Reducing the Marine Biosecurity Risk: Hull cleaning

Background: What is Hull Cleaning?

- Hull cleaning is the **removal of biofouling from vessel* hulls**
- Biofouling **may contain marine invasive non-native species (INNS)** which if disturbed or removed from the hull may subsequently establish themselves in docks and waterways across our ports.
- **INNS can present a biosecurity risk** to Peel Ports operations. Some of these organisms have also adapted survival strategies which allow larvae to be released when they are forcibly removed from a hull.
- **Hull cleaning can take place either in the water or in a dry dock,**
- In water cleaning is usually undertaken through the use of specialised divers or cleaning equipment. Dry dock cleaning involves a vessel being removed from the marine environment temporarily for manual cleaning in a dry dock.
- Hull cleaning and associated waste disposal **may require a permit or marine licence** from regulators or the local Port¹
- If in water hull cleaning is to be undertaken within one of the Peel Port Cluster Ports, permission **must** be obtained from the Statutory Harbour Authority. Dry Dock operators are responsible for ensuring adequate biosecurity procedures are in place during hull cleaning.
- If approval is granted for in water hull cleaning, the activity **must** be undertaken in accordance with the conditions of the permission issued by the local team.
- At the time of writing, there are no international standards for hull cleaning **Peel Ports have developed their own procedure** which should **be followed by all vessels** wishing to undertake in water hull cleaning across each port to reduce the risk of INNS spread and transfer into port waters as a result of this activity.

Peel Ports requirements from operators to reduce the biosecurity risk from hull cleaning across our ports:

- For small vessels, **hull cleaning should look to be conducted on land in a bunded area, larger vessels will require a dry dock.** If this is not possible, the **port will consider applications for in water cleaning on a case-by-case basis**
- **Permission must be sought** from the Statutory Harbour Authority for in water hull cleaning
- **Pre-arrival/departure inspections** may be requested from vessels which have or will undergo in water hull cleaning (e.g. eDNA surveys). Vessel **antifoulant certificate** may also be requested.
- The vessel operator must comply with any regulatory requirements ¹.
- A **risk assessment**² must be undertaken by the vessel owner or operator for in water hull cleaning
- If in water hull cleaning is permitted, **all debris** (including wash water, paint chippings and biofouling waste) **must be collected** and appropriately treated prior to disposal. It is the vessel owner or operators responsibility to ensure this is done in compliance with local regulations. The application for any **permits or licences** (including waste licences) for such activities **must be sought by the vessel owner** or operator.

** Vessel – includes any ship or boat, or any other description of vessel used in navigation as per the Merchant Shipping Act 1894*

¹ In Scotland the deposit of biofouling material is exempt from a Marine Directorate Licence under [Section 23](#) of The Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011. SEPA don't require any permissions or authorisations provided cleaning is undertaken via hand washing/brushing of the vessel to remove biofouling, providing that care is taken not to remove excess paint or cause a plume of pollution (debris, oil, etc.) during the process. No chemicals can be used during the process. Operators must also comply with Section 15 of The Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011.

In England the deposit of any material from a vessels hull cleaning either by hand using a soft cloth, sponge, bristles of a soft brush or sandpaper with a grit size of at least P2000 is exempt from a MMO Marine Licence. The Environment Agency or Natural England may have additional requirements, particularly if the activity is taking place within a Highly Protected Marine Area (HPMA) it is the operators responsibility to check they are compliant with any additional requirements from either Natural England or the Environment Agency.

²The SHA will require a:

- Environmental risk assessment for mitigating paint and pollution entering the marine environment from hull cleaning – into both the water and sediment.
- A **biosecurity risk assessment** to assess the risk of both the cleaning activity and any equipment used and identify control measures to mitigate INNS transfer risk. An [example biosecurity risk assessment](#) is available from the NNSS online.