



Date: 20<sup>th</sup> April 2007  
Ref: SAR0402

EU Transport Ministers  
(excl. UK, Netherlands, Italy, Malta, Germany & Belgium).

Dear Minister,

**Re. Preparations for national enforcement of Regulation (EC) No. 782/2003.**

As of 1st January 2008 it will, under Regulation (EC) No. 782/2003, be an offence for any ship visiting an EU port to have an active TBT-based antifouling coating present on its hull; all EU flagged vessels and all other vessels visiting EU ports should be TBT-free by this date.

This welcome Regulation, however, will only protect Europe's seas from the continuing harm caused by TBT if it is properly enforced. As you are aware, enforcement is the responsibility of national authorities and with less than nine months to go Seas At Risk and WWF would be interested to hear what preparations your country has been making to ensure that vessels with TBT on their hull do not pass through its ports without being detected. Specifically, are control authority staff being trained for the new procedures that will be required? Has the necessary sampling and testing equipment been sourced? What new resources are being made available for this enforcement work? And what proportion of visiting vessels does your country hope to test for TBT?

Compliance with Regulation (EC) No. 782/2003 would of course be greatly enhanced if the 2001 AFS Convention banning TBT use globally was in force, and Seas At Risk and WWF are working hard to bring this about. In the meantime though Regulation (EC) No. 782/2003 is Europe's main safeguard and it is essential that all EU states are ready and committed to rigorously enforcing the regulation's 1st January 2008 ban on the presence of TBT on ships visiting their ports.

Yours sincerely,

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