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Guidelines for Ban on use of Anti-Fouling Systems that contains Cybutryne.

Notice to: Ship Owners/ Managers/ Operators | Surveyors/Auditors

C22036 | 18 August 2022

The International Maritime Organization (IMO), through MEPC.331(76), has adopted amendments to the Anti-Fouling Systems Convention (AFS convention), which restricts the use of Cybutryne and also includes an operative passage with respect to the issuance of the new AFS certificate. The amendments will enter into force on 1 January 2023

The amendments prohibit application or re-application of anti-fouling systems containing Cybutryne (CAS No. 28159-98-0) on all ships from 1 January 2023.

The following rows have been added to the table in Annex 1 to the 2001 AFS Convention:

Anti-fouling system	Control measures	Application	Effective date
Cybutryne CAS No. 28159-98-0	Ships shall not apply or re-apply anti-fouling systems containing this substance	All ships	1 January 2023
Cybutryne CAS No. 28159-98-0	Ships bearing an anti-fouling system that contains this substance in the external coating layer of their hulls or external parts or	All ships except: (1) fixed and floating platforms, FSUs, and FPSOs that have been constructed prior to 1 January 2023 and that	At the next scheduled renewal of the anti-fouling system after 1 January 2023, but no later than 60 months

	surfaces on 1 January 2023 shall either: (1) remove the anti-fouling system; or (2) apply a coating that forms a barrier to this substance leaching from the underlying non-compliant anti-fouling system	have not been in dry-dock on or after 1 January 2023; (2) ships not engaged in international voyages; and (3) ships of less than 400 gross tonnage engaged in international voyages, if accepted by the coastal State(s)	following the last application to the ship of an anti-fouling system containing Cybutryne
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Furthermore, the amended Annex 4 of the AFS Convention provides a revised model form of the International Antifouling System (IAFS) Certificate. Based on verification of compliance to amended requirements, an updated IAFS Certificate will be issued reflecting the compliance options for controlled anti-fouling systems on the ship.

Act now

Ship Owners/ Managers and Operators are advised to take note of above requirements and accordingly ensure that necessary planning is done while procuring anti-fouling paints so that they do not contain Cybutryne. In case of ships where anti-fouling system already contains Cybutryne (CAS No. 28159-98-0) as on 1 January 2023, planning will be required for either the removal of such anti-fouling paint or for application of a sealing coating in consultation with the paint manufacturer to comply with the amended requirements.