

## Technical Notice

TD **10433 / 2022**

Dated: 23.12.2022

**SUBJECT:****Ban on use of Anti-Fouling Systems that contains Cybutryne**

IMO adopted amendments to the AFS Convention vide Resolution [MEPC 331 \(76\)](#) to include **controls on Cybutryne and an operative paragraph with respect to issuance of the new International Anti-fouling System Certificate.**

The amendments will enter into force on **1 January 2023.**

In addition to the already prohibited organotin compounds which act as biocides (try butyl tin, TBT) in anti-fouling systems, the ingredient cybutryne (CAS No. 28159-98-0) will be prohibited as per the amendments to the AFS Convention. The affected ship types and effective dates are listed in the table below:

Anti-fouling system	Control measures	Application	Effective date
<b>Cybutryne CAS No. 28159-98-0</b>	Ships shall not apply or re-apply antifouling systems containing	All ships	1 January 2023
<b>Cybutryne CAS No. 28159-98-0</b>	Ships bearing an anti-fouling system that contains this substance in the external coating layer of their hulls or external parts or surfaces on 1 January 2023 shall either: 1) remove the antifouling system; or 2) apply a coating that forms a barrier to this substance leaching from the underlying noncompliant anti-fouling system.	All ships except: 1) fixed and floating platforms, FSUs, and FPSOs that have been constructed prior to 1 January 2023 and that have not been in drydock 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).	At the next scheduled renewal of the anti-fouling system after 1 January 2023, but no later than 60 months following the last application to the ship of an anti-fouling system containing Cybutryne

Further, 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.

The International AFS **certificate** will change as of 1 January 2023 to **include extra cybutryne tick boxes** for the compliance options on controlled anti-fouling systems.

**Ships in operation** will need to comply with the requirement within the **first anti-fouling renewal survey after 1 January 2023 and will be issued a new International AFS certificate** which includes cybutryne-free compliance.

**Ships under construction**, which will be delivered after 1 January 2023, will need to be delivered as both TBT and cybutryne-free, and will be issued with an AFS certificate at the initial survey.

Ship owners/ managers and masters are advised to take note of above requirements and accordingly ensure that **necessary planning is done while procuring anti-fouling paints** so that it does 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 in order to comply with the amended requirements.