



TECHNICAL CIRCULAR No. 150 of 10th October 2013

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	Anti-Fouling Systems Surveys
Reference	Anti-Fouling Systems (AFS) Convention

Anti-Fouling Systems Surveys

Article 10 of the AFS Convention requires ships to be surveyed and certified in accordance with the regulations contained in Annex 4 of the Convention. This procedure outlines the surveys to be performed to check that a ship's anti-fouling system complies with the Convention.

Ships and barges of 400 gross tonnage and above engaged on international voyages (excluding fixed or floating platforms, MODUs, FSUs, and FPSOs) as specified in Regulation 1(1) of Annex 4 to the Convention, must be certified. Fixed or floating platforms, MODUs, FSUs and FPSOs are to comply with the Convention; excluding the survey and certification requirements of the Convention.

The AFS survey is principally a documentation review and does not necessarily require a visit to the ship.

Prior to commencing an AFS survey for issuance of either document or certificate, the Surveyor is to require submission of the following:

1 From the AFS Manufacturer

Confirmation that the anti-fouling system is in compliance with the Convention (with relevant version/amendment thereto identified) is required. Such declaration shall include the following information:

- Type of anti-fouling system
- Name of anti-fouling system manufacturer
- Name and color of anti-fouling system

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- Active ingredient(s) and their Chemical Abstract Service Registry Number (CAS number)
- Copy of the purchase order or contract linking the identified AFS with the ship to which it is be (or has been) applied

Where Organotin-free compounds are used, suitable wording describing such compounds are to be indicated in the documentation. Typical examples include: Organotin-free self-polishing type, Organotin-free ablative type, Organotin-free conventional, Biocide-free silicon type paint. If the AFS contains no active ingredients, the words 'Biocide-free' should be indicated. Supporting documentation (e.g., Material Safety Data Sheet or similar document) should also be submitted with the product information.

2 From the AFS Application Facility

A statement indicating that the non-compliant paint has been either removed and replaced or sealed with the AFS identified by the information provided by the AFS manufacturer; and a purchase order for the AFS that is to be or has been applied which provides a link to the information requested from the AFS manufacturer are required.

The following survey procedures apply to pre-convention and convention certification. Three principal methods of verifying AFS compliance are acceptable: sampling, testing and documentation review. AFS verification carried out by CONARINA is to be limited to reviewing the documentation required to be submitted per Section 1 above. The documentation review is to check that:

- Declaration indicates all of the information contained per Section 1 above;
- Product identification on the AFS containers corresponds to the declaration of AFS provided by the facility; and
- An identification system exists that establishes a traceable link between the supporting documentation and the AFS container based on a random check of the containers.

A survey (documentation check) should be carried out whenever an anti-fouling system is initially applied for new construction or is subsequently changed, replaced or repaired.

Resolution MEPC. 195(61) recommends that a repair which affects approximately 25% or more of the AFS (generally measured by repair area vs. the AFS covered area) requires a survey to be carried out.

If the documentation review reveals discrepancies, inconsistencies or does not provide for a traceable link between information, the AFS is to be re-tested by the AFS manufacturer or a firm recognized by the AFS manufacturer, unless matters can be resolved between the AFS manufacturer and the ship owner as to the cause for such discrepancies to the satisfaction of the Surveyor (and so documented between the parties).

It should be recognized that small quantities of Organotin compounds acting as a chemical catalyst (such as mono- and di- substituted Organotin compounds) are allowed under the AFS Convention, provided that such compounds are present at a level which does not provide a

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biocidal effect to the coating. On a practical level, an Organotin compound when used as a catalyst should not be present above 2,500 mg total tin per kg of dry paint.

3 General

Copies of the information required to be reviewed as per Section 1 above are to be attached to CONARINA' file copy of the Record of Anti-fouling Systems.

a. Non-Convention Certification

For non-Signatory states and after satisfactory completion of the survey outlined in this procedure, a Statement of Compliance (SOC) may be issued on behalf of the Administration, if so authorized by the Administration, or at the request of the ship owner a Statement Of Voluntary Compliance (SOVC). A completed AFS Record is to be attached to the SOC or SOVC.

b. Convention Certification

For Signatory states and after satisfactory completion of the survey outlined in this procedure, an International Anti-fouling Systems Certificate is to be issued.

When an IAFS certificate is issued, a completed IAFSC Record is to be attached to it.

NOTE: For ships that fly the flag of an EU Member State that is not yet signatory to the AFS Convention, and are required to comply with the EU AFS regulations, an EU IAFS certificate is to be issued, along with a completed EU IAFSC Record.

c. Declaration of Anti-fouling System

A ship of 24 meters or more in length but less than 400 gross tonnage engaged in international voyages (excluding fixed or floating platforms, MODUs, FSUs, and FPSOs) shall carry a Declaration signed by the Owner or Owner's authorized agent. The Declaration shall be accompanied by appropriate documentation (such as a paint receipt or a contractor invoice) or contain appropriate endorsement. Forms AFS Declaration and EU AFS Declaration may be provided to Owners for this purpose.

d. Recoating or Repairs

After Initial Survey and issuance of a full term International AFS certificate (IAFSC) and Record of Anti-fouling Systems (IAFSC Record), or SO(V)C and associated Record (AFS Record), the certificate or SO(V)C is valid for the life of the ship. Any changes or replacement of the existing anti-fouling system are to be endorsed on the Record, which may be a hand-written entry.

Details of new paint, i.e., supporting documentation (e.g., Material Safety Data Sheet or similar document) are to be placed in report to explain action taken.

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Repairs generally do not require a survey. However, repairs affecting approximately twenty-five (25) percent or more of the anti-fouling system, should be considered as a change or replacement of the anti-fouling system regardless of whether the same AFS or a different system is applied. In these cases, the Record of AFS is to be endorsed.

REFERENCES:

- MLC 2006

ATTACHMENTS: No.

Kindest Regards,

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