



## **TECHNICAL CIRCULAR No. 624 of 4<sup>th</sup> May 2020**

To	All Surveyors/Auditors
Applicable to flag	All Flags
Title	<b>Occasional Survey- Anti-Fouling</b>
Reference	CONARINA - Instructions

### **Occasional Survey- Anti-Fouling**

#### **Preparation**

The Anti-Fouling Systems (AFS) Convention does not require that a ship have an AFS, only that a ship must comply with the AFS Convention if it does in fact have an AFS.

The type of anti-fouling systems controlled (prohibited) are indicated in Annex 1 of the AFS Convention.

A survey (documentation check) should be carried out whenever an anti-fouling system is initially applied 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.

#### **Required Documentation**

Prior to commencing, the Surveyor is to require the manufacturer and the application facility to submit the following:

From the 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
- 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 the AFS is to be (or has been) applied
- Material Safety Data Sheet (MSDS) or similar document to support the use of Organotin-free or Biocide-free AFS should also be submitted with the product information, if applicable.

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From the AFS application facility, following documents must be obtained:

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

### **Task**

AFS verification carried out by ABS is to be limited to reviewing the documentation required to be submitted. The documentation review is to check that:

1. The declaration includes all of the required information.
2. The product identification on the AFS containers corresponds to the declaration of AFS provided by the facility; and
3. 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.

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).

### **Special Instructions**

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. Vessels with no documentation or previously banned coatings can have their coatings sampled and tested in accordance with MEPC.104 (49) to prove compliance.

### REFERENCES:

- CONARINA – Instructions. Courtesy of ABS

- ATTACHMENTS: No

kindest Regards,

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