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TECHNICAL CIRCULAR No. 688 of 4th July 2021

To	All Surveyors/Auditors. All flags
Title	**Cybutryne in Ships**
Reference	AFC-Antifouling Systems (from 1st January 2023)

IMO forbids toxic for a Cybutryne in Ships

IMO has prohibited the use of cybutryne in antifouling Systems (AFS) from 1st January 2023. Studies have proven that the cybutryne is harmful to a variety of marine organisms.

Cybutryne Replacement Effects

After the International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS Convention) took effect in 2008, tributyltin (TBT) was removed from anti-fouling paints and replaced by several new biocides. One of these replacements was cybutryne which is used in hull paint to prevent biofouling growth.

In 2019, it was brought to the attention of the IMO cybutryne is acutely chronically toxic for a variety of marine organisms and in some respects even more harmful than TBT. The substance accumulates in sediments and causes long-tem effects on the marine environment. As such it should not be permitted.

AFS Life Service

An anti-fouling system (AFS) works by leaching biocides from the top layer of paint throughout its lifetime, which is usually five years. Before the end of the AFS' service life, it is reapplied to the ship.

IMO's research

According to the results of some analysis, it can be concluded that there would be almost no environmental benefits in requiring removal or sealer coatings for ships bearing an AFS containing cybutryne which is reaching of has passed the end of its service life.

IPPIC experts

Additional reasearch carried out by the International Paint and Painting Ink Council (IPPIC) hightlighted an important point regarding appling an AFS system using a different biocide other than cybutryne.IPPIC experts have concluded that these products will also prevent cybutryne leaching from underlying coating layers.In addition, applying a fresh anti-fouling coating oven an

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underlying non-compliant product can prevent biocide leaching by"sealing in" the biocide within the underlying coating layers.

BIMCO argued that the aplication of a new anti-fouling coating without the removal of the old AFS should be permited.

IMO's Amendments

At the 76TH MEPC session, IMO adopted amendments to the Convention on cybutryne and the form of the International Anti-fouling System Certificate. The amendments will enter into force on 1st January 2023. From this date, the application or re-application of an AFS containing cybutryne will not be permited.

Sjips bearing an AFS that contains this substance in the external coating layer of their hulls or external parts or surfaces shall either:

- Remove the anti-fouling system; or
- Apply a coating that forms a barrier to prevent cybutryne leaching from the underlying AFS

Amendments application

This amendment applies to all ships except existing fixed and floating platforms; ships not engaged in international voyages; and ships of less than 400 GT engagedin internaional voyages, if accepted by the Coastal State(s).

This applies to the next scheduled renewal of the AFS after 1st January 2023, but no later than 60 months following the last application of an AFS containing cybutryne to the ship.

REFERENCES:

- International Anti-fouling System

ATTACHMENTS: No

Kindest Regards,
CONARINA Technical Office

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