
4 ALBERT EMBANKMENT
LONDON SE1 7SR
Telephone: +44 (0)20 7735 7611 Fax: +44 (0)20 7587 3210

Circular Letter No.4351
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To: All IMO Members
Parties to the AFS Convention which are not Members of IMO

Subject: **Amendments to the International Convention on the Control of
Harmful Anti-Fouling Systems on Ships (AFS Convention)**

1 MEPC 75 (16 to 20 November 2020) approved draft amendments to the International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS Convention) regarding controls on cybutryne and the form of the International Anti-Fouling System Certificate, with a view to adoption at MEPC 76 (10 to 17 June 2021).

2 The Secretary-General has the honour to transmit herewith, in accordance with article 16(2)(a) of the AFS Convention, the text of the draft amendments referred to above and set out in the annex, with a view to their consideration for adoption at MEPC 76 in accordance with articles 16(2)(b) and (c) of the said Convention.

ANNEX

**DRAFT AMENDMENTS TO THE INTERNATIONAL CONVENTION ON THE
CONTROL OF HARMFUL ANTI-FOULING SYSTEMS ON SHIPS**

**Annex 1
Controls on anti-fouling systems**

1 The following rows are added to the table in Annex 1 to the AFS Convention:

Anti-fouling system	Control measures	Application	Effective date
Cybutryne CAS No. 28159-98-0	Ships shall not apply or reapply 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 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	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 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))	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

Annex 4
Surveys and certification requirements for anti-fouling systems

2 Regulation 2(3) is amended as follows:

"(3) For ships bearing an anti-fouling system controlled under Annex 1 that was applied before the date of entry into force of a control for such a system, the Administration shall issue a Certificate in accordance with paragraphs (1) and (2) of this regulation not later than 2 years after entry into force of that control. This paragraph shall not affect any requirement for ships to comply with Annex 1."

Appendix 1 to Annex 4
Model form of International Anti-fouling System Certificate

3 The section of the model form of the International Anti-fouling System Certificate (appendix 1) listing the compliance options for controlled anti-fouling systems on the ship is replaced by the following:

"An anti-fouling system controlled under Annex 1 containing:

	has not been applied during or after construction of this ship	has been applied on this ship previously, but has been removed by	has been applied on this ship previously, but has been covered with a sealer coat applied by	was applied on this ship prior to
organotin compounds which act as biocides	<input type="checkbox"/> <i>(insert name of the facility)</i> on <i>(date)</i> <i>(insert name of the facility)</i> on <i>(date)</i>	No longer applicable
cybutryne	<input type="checkbox"/> <i>(insert name of the facility)</i> on <i>(date)</i> <i>(insert name of the facility)</i> on <i>(date)</i>	1 January 2023, but must be removed or covered with a sealer coat prior to <i>(date)</i>

"
