

**CIRCULAR No. 83*****PORTUGUESE MARITIME ADMINISTRATION***

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**SUBJECT** | International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS), 2001 - Prohibition of Cybutryne in Anti-Fouling Coating Systems

**To** | Owners, Operators, Companies of Portuguese Ships, Recognized Organizations, Masters of Portuguese Flag Ships, and Representatives of foreign-flagged ships calling at Portuguese ports and anchorages

**DISCLAIMER** | This document is for information only and is not intended to interpret or replace the legal referenced documents published by official sources

**REFERENCES** | This Circular should be read in conjunction with Circular 59 in its updated version and IMO Resolution MEPC.331(76)

**1. OBJECTIVE**

This Circular aims to providing a more detailed description of the amendments to the AFS Convention set out in IMO Resolution MEPC.331(76), in addition to those contained in Circular No. 59/Rev. 2 of 7 October 2024, emphasizing the prohibition of cybutryne in anti-fouling coatings.

**2. AMENDMENTS TO THE AFS CONVENTION**

The International Convention on the Control of Harmful Anti-Fouling Systems on Ships, the AFS Convention, was adopted on 5 October 2001 and has been implemented in the Environmental Safety Regulations, recital 17, by reference to Regulation (EC) No. 782/2003 of 14 April.

Commission Delegated Regulation (EU) No. 1062/2014, of 4 of August, established a list of all active substances included in biocidal products covered by Regulation (EU) No. 528/2012 of 22 of May.

According to Commission Implementing Decision (EU) 2016/107, Cybutryne is not approved as an active substance in biocidal products and therefore cannot be used in anti-fouling systems

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## *PORTUGUESE MARITIME ADMINISTRATION*

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applied to hulls, external parts or surfaces of ships, as for Regulation (EU) No. 528/2012 Annex V, product-type 21 - Antifouling products.

From 17 August 2017, it became illegal to use Cybutryne in anti-fouling systems placed on the market in the EEA.

Since 1 January 2023, the amendments to the AFS Convention, adopted under IMO Resolution MEPC.331(76), have entered into force. The amendments introduce new requirements that ban the future installation of anti-fouling systems which contain a toxic substance called Cybutryne (CAS No. 28159-98-0).

### **3. APPLICATION**

Ships shall not apply or re-apply anti-fouling systems containing Cybutryne on or after 1<sup>st</sup> January 2023.

Ships bearing an anti-fouling system that contains Cybutryne in the external coating layer of their hulls, or external parts or surfaces on the 1<sup>st</sup> January 2023, shall either:

- a) Remove the anti-fouling system; or
- b) Apply a coating that forms a barrier to this substance leaching from the underlying non-compliant anti-fouling system.

The measures listed above must be put in place at the first scheduled renewal of the antifouling system after 1<sup>st</sup> January 2023, but no later than 60 months following the last application to the ship of an anti-fouling system containing Cybutryne.

Existing coatings on the following ships are excepted from the requirements:

- a) Fixed and Floating Platforms, Floating Storage Units, and Floating Production Storage and Offloading installations that have been constructed prior to 1st January 2023 and that have not been in dry-dock on or after 1<sup>st</sup> January 2023;
- b) Ships not engaged in international voyages; and
- c) Ships of less than 400 gross tonnage engaged in international voyages are not required to have an AFS Certificate. These ships, with anti-fouling systems containing Cybutryne applied before 1 January 2023, may be exempt from the requirements. One condition



## PORTUGUESE MARITIME ADMINISTRATION

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for the exemption is acceptance from the coastal state(s) concerned with ports called at by foreign vessels of less than 400 gross tonnage.

The ban on Cybutryne in anti-fouling systems requires changes to the survey and certification procedures for ships of 400 gross tonnage and above engaged on international voyages.

#### 4. ACTIONS FOR OWNERS AND COMPANIES OF PORTUGUESE FLAG SHIPS

Owners and companies of Portuguese Flag Ships with anti-fouling systems containing Cybutryne are urged to contact the RO in order to arrange for an AFS survey and the issuance of a new revised AFS certificate, as per annex I.

Lisbon, 18.3.2026

The General Director of Natural Resources, Safety and Maritime Services



#### More information

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PORTUGUESE MARITIME ADMINISTRATION

ANEXO I

 <b>REPÚBLICA PORTUGUESA</b> <small>THE PORTUGUESE REPUBLIC</small>	<b>CERTIFICADO INTERNACIONAL DE SISTEMA ANTIVEGETATIVO</b> <i>INTERNATIONAL ANTI-FOULING SYSTEM CERTIFICATE</i>  N.º / Nr. AFS n.º / ano
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(O presente certificado deve ser complementado por um Registo de Sistemas Antivegetativos)  
*(This certificate shall be supplemented by a Record of Anti-fouling Systems)*

Emitido de acordo com a Convenção Internacional relativa ao Controlo dos Sistemas Antivegetativos Nocivos nos NAVIOS, sob a autoridade do Governo da República Portuguesa pela DIREÇÃO-GERAL DE RECURSOS NATURAIS, SEGURANÇA E SERVIÇOS MARÍTIMOS

*Issued under the International Convention on the Control of Harmful Anti-Fouling Systems on Ships under the authority of the Government of the Portuguese Republic by DIREÇÃO-GERAL DE RECURSOS NATURAIS, SEGURANÇA E SERVIÇOS MARÍTIMOS*

Caso exista um Certificado anterior, este Certificado substitui o certificado com data de: / /  
*When a Certificate has been previously issued, this Certificate replaces the certificate dated: / /*

Nome do Navio <i>Name of ship</i>	Distintivo do Navio em Número ou Letras <i>Distinctive number or letters</i>	Porto de Registo <i>Port of registry</i>	Arqueação Bruta <i>Gross tonnage</i>	Número IMO <i>IMO number</i>

- O navio não foi objeto da aplicação de qualquer sistema antivegetativo controlado que contém compostos organoestânicos que atuam como biocidas, em conformidade com o Anexo I da Convenção, durante ou após a sua construção.  
*An anti-fouling system controlled under Annex I to the Convention containing organostannic compounds which act as biocides has not been applied during or after construction of this ship*

- O navio não foi objeto da aplicação de qualquer sistema antivegetativo controlado que contém Cybutrim, em conformidade com o Anexo I da Convenção, durante ou após a sua construção.  
*An anti-fouling system controlled under Annex I to the Convention containing Cybutrim has not been applied during or after construction of this ship*

- O navio foi anteriormente objeto da aplicação de um sistema antivegetativo controlado que contém compostos organoestânicos que atuam como biocidas, em conformidade com o Anexo I da Convenção, o qual foi removido por (nome da instalação) em (dd mm aaaa).  
*An anti-fouling system controlled under Annex I to the Convention containing organostannic compounds which act as biocides has been applied on this ship previously, but has been removed by (insert name of the facility) on (dd/mm/yyyy)*

- O navio foi anteriormente objeto da aplicação de um sistema antivegetativo controlado que contém Cybutrim, em conformidade com o Anexo I da Convenção, o qual foi removido por (nome da instalação) em (dd mm aaaa).  
*An anti-fouling system controlled under Annex I to the Convention containing Cybutrim has been applied on this ship previously, but has been removed by (insert name of the facility) on (dd/mm/yyyy)*

- O navio foi anteriormente objeto da aplicação de um sistema antivegetativo controlado que contém compostos organoestânicos que atuam como biocidas, em conformidade com o Anexo I da Convenção, ao qual foi aplicado um revestimento isolante por (nome da instalação) em (dd mm aaaa).  
*An anti-fouling system controlled under Annex I to the Convention containing organostannic compounds which act as biocides has been applied on this ship previously, but has been covered with a sealer coat applied by (insert name of the facility) on (dd/mm/yyyy)*

MC-DSAM-410(1)



**PORTUGUESE MARITIME ADMINISTRATION**

- O navio foi anteriormente objeto da aplicação de um sistema antivegetativo controlado que contém *Cybutrine*, em conformidade com o Anexo 1 da Convenção, ao qual foi aplicado um revestimento isolante por [ ] (nome da instalação) em [ ] (dd mm aaaa).

*An anti-fouling system controlled under Annex 1 to the Convention containing Cybutrine has been applied on this ship previously, but has been covered with a sealant coat applied by [ ] (insert name of the facility) on [ ] (dd/mm/yyyy).*

- O navio foi anteriormente objeto da aplicação de um sistema antivegetativo controlado que contém *Cybutrine*, em conformidade com o Anexo 1 da Convenção, mas não se encontra no exterior do casco ou quaisquer outras partes externas em 1 de janeiro de 2023.

*An anti-fouling system controlled under Annex 1 to the Convention containing Cybutrine has been applied on this ship previously, but is not in the external coating layer of the hull or external parts or surfaces on 1 January 2023.*

- O navio foi objeto da aplicação de um sistema antivegetativo controlado que contém *Cybutrine*, em conformidade com o Anexo 1 da Convenção, antes de 1 de janeiro de 2023, o qual deve ser removido ou ao qual deve ser aplicado um revestimento isolante até [ ] (dd mm aaaa).

*An anti-fouling system controlled under Annex 1 to the Convention containing Cybutrine has been applied on this ship prior to 1 January 2023, but must be removed or covered with a sealant coat prior to [ ] (dd/mm/yyyy).*

**Certifica-se:**

*THIS IS TO CERTIFY THAT:*

1 - O navio foi vistoriado de acordo com a regra 1 do Anexo 4 à Convenção; e

*The ship has been surveyed in accordance with regulation 1 of Annex 4 to the Convention; and*

2 - A vistoria comprova que o sistema antivegetativo do navio cumpre com as prescrições aplicáveis do anexo 1 à Convenção.

*The survey shows that the anti-fouling system on the ship complies with the applicable requirements of Annex 1 to the Convention.*

Emitido em:

*Issued at:*

(Local de emissão do Certificado)

*(Place of issue of the Certificate)*

Aos: dd / mm / aaaa

(Data de emissão)

*(Date of issue)*

(Assinatura da pessoa autorizada a emitir o Certificado)

*(Signature of authorized official issuing the Certificate)*

Data de conclusão da vistoria com base na qual o presente Certificado é emitido: dd / mm / aaaa.

*Date of completion of the survey on which this certificate is issued:*

NOTA: Registos dos Sistemas Antivegetativos n.º AFR n.º / ano

*Note: Record of Anti-Fouling Systems nr.*

MC-DSAM-410(1)

