

CIRCULAR No. 84**PORTUGUESE MARITIME ADMINISTRATION**

SUBJECT | Inclusion of Cybutryne in the Inventory of Hazardous Materials on ships under Regulation (EU) No. 1257/20013

TO | Owners and Companies of Portuguese-flagged ships; Recognized Organizations; Masters of Portuguese-flagged ships; and Representatives of foreign-flagged ships calling at Portuguese ports and anchorages

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REFERENCES | Regulation (EU) No. 1257/20013 on ship recycling
EMSA Guidance on the inclusion of Cybutryne in the Inventory of Hazardous Materials IHM requirements under Regulation (EU) No 1257/2013
IMO Resolution MEPC.331(76) - Amendments to the AFS Convention, 2001
IMO Resolution MEPC.379(80) - 2023 Guidelines to the development of IHM

1. OBJECTIVE

This circular informs the procedure to include Cybutryne in the Inventory of Hazardous Materials on ships under Regulation (EU) No. 1257/20013 on ship recycling (SRR), to comply with the IMO Resolution MEPC.331(76), which shall be applied over Portuguese flag ships.

2. APPLICATION

In accordance with Annexes I and II to SRR "*Anti-fouling compounds and systems*" regulated under Annex I to the AFS Convention¹ shall be listed in the inventory of hazardous materials (IHM) provided by Article 5 of the SRR.

For new ships - built on or after 1 January 2023 - should have aboard an IHM, which shall record that there is no Cybutryne in their anti-fouling system.

¹ International Convention on the Control of Harmful Anti-fouling Systems on Ships, 2001.

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PORTUGUESE MARITIME ADMINISTRATION

For existing ships, the inclusion of Cybutryne - in concentrations on average above 1,000 mg per kg of dry paint - in the IHM should happen immediately when maintenance results in the update of the IHM to include new materials or a survey under Article 8(3) SRR takes place.

The Cybutryne determination should be made based on the information in either the supplied material declaration, or in the absence of a material declaration, sampling and testing data (see [IMO Resolution MEPC.379\(80\)](#) and [EMSA Guidance](#)).

Lisbon, 18-03-2026

The General Director of Natural Resources, Safety and Maritime Services



More information

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