



**Sayı** : 38591462-730.99-2021-1776

21.06.2021

**Konu** : IMO'nun Cybutryne Kullanımını Yasaklaması Hk.

Sirküler No: 654

Sayın Üyemiz,

Baltık ve Uluslararası Denizcilik Konseyi'nden (Baltic and International Maritime Council - BIMCO) alınan 18.06.2021 tarihli Ek'te sunulan yazıda;

Uluslararası Denizcilik Örgütü (International Maritime Organization - IMO) Deniz Çevresini Koruma Komitesi'nin (Maritime Environmental Protection Committee - MEPC) 76'ncı oturumunda IMO'nun, cybutryne'nin çeşitli deniz organizmalarına zararlı olduğunu gösteren çalışmalar nedeniyle 1 Ocak 2023 tarihinden itibaren çürümeyi önleyici sistemler kapsamında kullanılmasını yasakladığı bildirilmektedir.

Yazıda, Gemilerdeki Zararlı Çürümeyi Önleyici Sistemlerin Kontrolüne İlişkin Uluslararası Sözleşme'nin (International Convention on the Control of Harmful Anti-Fouling Systems on Ships - AFS Convention) 2008 yılında yürürlüğe girmesinden sonra tributyltin'in (TBT) çürümeyi önleyici boyalar kapsamında çıkarıldığı ve çeşitli yeni biyositler ile değiştirildiği ifade edilmektedir.

Yazıda devamla, cybutryne'nin çeşitli deniz organizmaları için son derece zehirli bir yapıya sahip olduğu ve bazı açılardan tributyltin'den bile zararlı olduğu hususunun 2019 yılında IMO'nun dikkatine sunulduğu ifade edilmektedir. Ayrıca, söz konusu maddenin sedimanlarda biriktiği, deniz çevresinde uzun vadede çeşitli etkilere sebep olduğu ve söz konusu etkiler nedeniyle kullanımına izin verilmemesi gerektiği bildirilmektedir.

Konuya ilişkin detaylı bilgi Ek'te sunulmaktadır.

Bilgilerinize arz/rica ederim.

Saygılarımla,

İsmet SALİHOĞLU  
Genel Sekreter

**Ek:**BIMCO'dan alınan 18.06.2021 tarihli yazı. (3 sayfa)

Dağıtım:

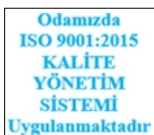
Gereği:

- Tüm Üyeler (WEB sayfası ve e-posta ile)
- Türk Armatörler Birliği
- S.S. Gemi Armatörleri Motorlu Taşıyıcılar Kooperatifi

Bilgi:

- Yönetim Kurulu Başkan ve Üyeleri

**Bu belge, 5070 sayılı Elektronik İmza Kanuna göre Güvenli Elektronik İmza ile İmzalanmıştır.**



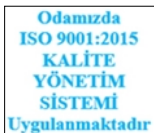
Evrakı Doğrulamak İçin : <https://ebys.denizticaretodasi.org.tr/enVision/Dogrula/8AKJ1K>  
Bilgi için: Esat Emre ERDOĞAN Telefon: 0212 252 01 30/485 E-Posta: emre.erdogan@denizticaretodasi.org.tr  
Meclis-i Mebusan Caddesi No:22 34427 Fındıklı-Beyoğlu-İSTANBUL/TÜRKİYE  
Tel : +90 (212) 252 01 30 (Pbx) Faks: +90 (212) 293 79 35  
Web: www.denizticaretodasi.org.tr E-mail: iletisim@denizticaretodasi.org.tr KEP: imeakdto@hs01.kep.tr





- GİSBİR (Türkiye Gemi İnşa Sanayicileri Birliği Derneği)
- VDAD (Vapur Donatanları ve Acenteleri Derneği)
- KOSDER (Koster Armatörleri ve İşletmecileri Derneği)
- Gemi Tedarikçileri Derneği

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## INTERNATIONAL MARITIME ORGANIZATION BANS TOXIC PAINT SUBSTANCE CYBUTRYNE

### Overview

At the 76th session of the Maritime Environmental Protection Committee (MEPC 76), the IMO has prohibited the use of cybutryne in antifouling systems (AFS) from 1 January 2023, as studies have proven that the substance is harmful to a variety of marine organisms.

- [NEWS STORY](#)
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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 that cybutryne is acutely and 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-term effects on the marine environment. As such it should not be permitted.

### IMO's work

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.

In 2020, organisations and member states of the IMO conducted extensive research into cybutryne used in AFS.

Japan carried out an investigation on the amount of cybutryne remaining in an AFS around the end of its service life. The samples taken from AFS near the end of their lifetimes showed very low concentrations of cybutryne:

“According to the result of the analysis, it can be concluded that there would be almost no environmental benefit in requiring removal or sealer coatings for ships bearing an AFS containing cybutryne which is reaching or has passed the end of its service life. (PPR 7/6/4, Remaining amount of cybutryne in an anti-fouling system (AFS) by Japan).”

Additional research carried out by the International Paint and Printing Ink Council (IPPIC) highlighted an important point regarding applying an AFS system using a different biocide other than cybutryne:

“Based on a review of the physical and chemical properties of cybutryne and tributyltin, IPPIC experts have concluded that these products will also prevent cybutryne leaching from underlying coating layers. In addition, applying a fresh anti-fouling coating over an underlying non-compliant product can prevent biocide leaching by "sealing in" the biocide within the underlying coating layers. (PPR 7/6 – Use of anti-fouling paints containing cybutryne on ships and pleasure craft, function and availability of sealer coats which prevent leaching of cybutryne from underlying coatings, and guidance on the control of cybutryne-contaminated dry-docking wastes by IPPIC).”

On behalf of our members, BIMCO had concerns that a shipowner that had applied cybutryne in accordance with the AFS convention would be forced to strip the hull to bare steel when changing to a new AFS. Based on the two studies and their conclusions as mentioned above, BIMCO successfully

argued that the application of a new anti-fouling coating without the removal of the old AFS should be permitted.



#### New regulation

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

Ships 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.

This amendment applies to all ships except existing fixed and floating platforms, floating storage units, and floating production storage and offloading facilities that have been constructed and not been in dry-dock on or after 1 January 2023; ships not engaged in international voyages; and ships of less than 400 gross tonnage engaged in international voyages, if accepted by the coastal State(s).

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

BIMCO, together with China, Japan, Russian Federation, Singapore, IACS and ICS, submitted a paper suggesting modifications to the model form of the International Anti-fouling System Certificate (IAFSC).

The paper received massive support from IMO member states. Additions have therefore been added to clarify which column should be marked on the IAFSC for ships that have applied an anti-fouling system containing cybutryne previously, when the system is not contained in the external coating layer of their hulls or external parts or surfaces.

Feedback or a question about this information?

Contact Aron Soerensen

- [\(+45\) 4436 6871](tel:+4544366871)
- [hsse@bimco.org](mailto:hsse@bimco.org)