



# RUSSIAN MARITIME REGISTER OF SHIPPING

**CIRCULAR LETTER**

**No. 314-04-1848c**

dated 08.11.2022

Re:

amendments to the Rules for the Classification and Construction of Sea-Going Ships, 2022, ND No. 2-020101-152-E and the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships, 2022, ND No. 2-020101-156-E

Item(s) of supervision:

antifouling coatings

Entry-into-force date:

**From the date of publication**

~~Cancels / amends / adds Circular Letter No.~~

~~dated~~

Number of pages: 1 + 3

Appendices:

Appendix 1: information on amendments introduced by the Circular Letter

Appendix 2: text of amendments to Part XIII "Materials" of the Rules for the Classification and Construction of Sea-Going Ships and to Part III "Technical Supervision during Manufacture of Materials" of the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships

Director General

Konstantin G. Palnikov

Text of CL:

We hereby inform that on 01.01.2023 the Rules for the Classification and Construction of Sea-Going Ships shall be amended as specified in the Appendices to the Circular Letter related to the entry-into-force of IMO resolution MEPC.331(76) amending the International Convention on the Control of Harmful Anti-Fouling Systems on Ships (AFS Convention) on prohibition of cybutryne. The provisions of this Circular Letter are recommended for application from the date of its publication.

It is necessary to do the following:

1. Bring the content of the Circular Letter to the notice of the RS surveyors, interested organizations and persons in the area of the RS Branch Offices' activity.
2. Apply the provisions of the Circular Letter during review and approval of the technical documentation and when performing technical supervision during manufacture of antifouling systems for ships requested for review on or after 01.01.2023.
3. Apply the provisions of the Circular Letter before 01.01.2023 during review and approval of the technical documentation and when performing technical supervision during manufacture of antifouling systems for ships upon requests of manufacturers with indication of information on application of IMO resolution MEPC.331(76).

List of the amended and/or introduced paras/chapters/sections:

Rules for the Classification and Construction of Sea-Going Ships

Part XIII: paras 6.5.2.2 and 6.5.2.3

Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships

Part III: paras 3.1.3.2, 3.1.3.3.1, 3.1.3.3 and 3.1.3.4

Person in charge: Sergey M. Kordonets 314

+7 (812) 314-07-34

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**Information on amendments introduced by the Circular Letter  
(for inclusion in the Revision History to the RS Publication)**

Nos.	Amended paras/chapters/ sections	Information on amendments	Number and date of the Circular Letter	Entry-into-force date
1	Rules for the Classification and Construction of Sea-Going Ships, Part XIII, para 6.5.2.2	Requirements for application of cybutryne in antifouling coatings have been specified considering amendments to AFS-Convention introduced by IMO resolution MEPC.331(76) and provisions of IMO resolutions MEPC.356(78) and MEPC.358(78)	341-04-1848c of 08.11.2022	08.11.2022
2	Rules for the Classification and Construction of Sea-Going Ships, Part XIII, para 6.5.2.3	Requirements for antifouling coatings have been specified considering amendments to AFS-Convention introduced by IMO resolution MEPC.331(76) and provisions of IMO resolutions MEPC.356(78) and MEPC.358(78)	341-04-1848c of 08.11.2022	08.11.2022
3	Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships, Part III, para 3.1.3.2	Requirements for antifouling coatings have been specified considering amendments to AFS-Convention introduced by IMO resolution MEPC.331(76); terminology has been specified	341-04-1848c of 08.11.2022	08.11.2022
4	Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships, Part III, para 3.1.3.3	Requirements for antifouling coatings have been specified considering amendments to AFS-Convention introduced by IMO resolution MEPC.331(76) and provisions of IMO resolutions MEPC.356(78) and MEPC.358(78); terminology has been specified	341-04-1848c of 08.11.2022	08.11.2022
5	Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships, Part III, para 3.1.3.4	Reference has been specified	341-04-1848c of 08.11.2022	08.11.2022

## **RULES FOR THE CLASSIFICATION AND CONSTRUCTION OF SEA-GOING SHIPS, 2022,**

**ND No. 2-020101-152-E**

### **PART XIII. MATERIALS**

#### **6 PLASTICS AND MATERIALS OF ORGANIC ORIGIN**

1 **Paras 6.5.2.2 and 6.5.2.3** are replaced by the following text:

**6.5.2.2** Ships shall not apply anti-fouling coatings containing:  
organotin compounds (CAS No. 7440-31-5) acting as biocides. It is allowed to use minor quantity of organotin compounds acting as chemical accelerator (such as monosubstituted and disubstituted organotin compounds) provided they do not act as biocides. If used as an accelerator the organotin compounds shall not contain more than 2500 mg of tin in 1 kg of dry colour. Measurement tolerance shall not exceed 20 %;

cybutryne (CAS No. 28159-98-0). The content of cybutryne when sampling from a container with liquid colour shall not exceed 200 mg of cybutryne in 1 kg of dry colour. When sampling dry colour from the ship's hull, the value of cybutryne shall not exceed 1000 mg in 1 kg of dry colour. Measurement tolerance shall not exceed 25 %.

**6.5.2.3** Antifouling coatings shall be supplied with the Register Type Approval Certificate. If the Register Type Approval Certificate is not available the provisions of 2.15 and 2.16, Part I "General Regulations for Technical Supervision" of the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships shall be considered. Instructions on issuance of Type Approval Certificate are given in 3.1, Part III "Technical Supervision during Manufacture of Materials" of the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships. Instructions on the initial survey in accordance with the AFS-Convention for ships under construction as well as for ships in service are given in 2.4, Part III "Survey of Ships in Compliance with International Conventions, Codes and Resolutions" of the Guidelines on Technical Supervision of Ships in Service."

## **RULES FOR TECHNICAL SUPERVISION DURING CONSTRUCTION OF SHIPS AND MANUFACTURE OF MATERIALS AND PRODUCTS FOR SHIPS, 2022,**

**ND No. 2-020101-156-E**

### **PART III. TECHNICAL SUPERVISION DURING MANUFACTURE OF MATERIALS**

#### **3 NON-METALLIC MATERIALS**

2 **Paras 3.1.3.2 — 3.1.3.4** are replaced by the following text:

**3.1.3.2** The documentation being submitted for approval shall include:  
technical data for the coating (technical conditions, specifications, Data Sheet);  
material safety data (Material Safety Data Sheet) (such data may be also contained in technical conditions, specification));  
coating manufacturer's certificate (quality certificate for coating) issued for each batch (delivery) of the coating, which shall provide for the above data;

records of qualification tests (analysis) of specimens confirming absence of organotin compounds and cybutryne in the coating (refer to 3.1.3.3).

**3.1.3.3** Sampling and qualification tests (analysis) of specimens, confirming absence of organotin compounds and cybutryne in the coating, shall be carried out in the testing laboratory recognized by the Register. Where the latter is unavailable, the sampling and analysis shall be performed at the attendance of the RS surveyor. The Register may accept results of the tests carried out under ACS technical supervision (refer to 3.1.1.2.1).

**3.1.3.3.1** As an alternative to the qualification tests, statistical data of given coating analyses may be considered (refer also to 3.1.1.2.1).

**3.1.3.3.2** The analysis with regard to the total content of tin and cybutryne per kilo of dry paint is recommended to carry out by applying mass spectrometry with inductively coupled plasma (ICP/MS) and gas chromatography — mass spectrometry (GC-MS). Any other scientifically-recognized procedure for the tin analysis (e.g. AAS, XRF and ICP-OES) is also acceptable.

**3.1.3.3.3** The analysis results shall be consistent with the requirements of 6.5.2.2, Part XIII of the Rules for the Classification and Construction of Sea-Going Ships.

**3.1.3.4** If the testing laboratory carrying out the regular analysis of coating tin content belongs to the coating manufacturer, that testing laboratory shall be surveyed simultaneously with the manufacturer according to Section 10, Part I "General Regulations for Technical Supervision".