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## IMCO

INTERNATIONAL CONFERENCE  
ON MARINE POLLUTION, 1973  
Agenda item 7

### CONSIDERATION OF A DRAFT INTERNATIONAL CONVENTION FOR THE PREVENTION OF POLLUTION FROM SHIPS

Comments and proposals on the draft text  
of the Convention

Submitted by the Government of France

Attached hereto are the comments on the draft text of an International Convention for the Prevention of Pollution from Ships, 1973, by the Government of France.

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\* Outside translation.

COMMENTS BY THE FRENCH GOVERNMENT ON THE DRAFT TEXT OF AN  
INTERNATIONAL CONVENTION FOR THE PREVENTION OF POLLUTION  
FROM SHIPS, 1973

Preamble, footnote 2: The proposed insertion does not appear to be particularly necessary and it is not usual to emphasize interest in a convention which is to be replaced by a new text. A statement of this kind would be more appropriate in a separate resolution which would be adopted by the Conference.

Footnote 3: A proposal such as this would certainly cause confusion: the present Convention does not in fact annul the 1954 Convention, which will remain in force between the Parties to both Conventions and those parties to the 1954 Convention which are not parties to the 1973 Convention. The words "as between the Parties to both Conventions" would only apply in the relations between two States which are parties to both Conventions. This is an established rule in International Law which need not be referred to here as it would not apply to all aspects of the problem.

4th paragraph ("Considering....."): Some States have not accepted the successive amendments to the 1954 Convention, and the phrase "as between the Parties thereto" should therefore be deleted.

Article 1 and subsequent: The French Government does not consider it necessary for this Convention to be entered into formally, and would therefore like the formula "Contracting State" to be replaced by "the parties to the present Convention".

Article 2 (2 and subsequent): In the French text the term "Administration" must be replaced by "Autorité". The definition given in paragraph (2) does not in fact apply to the "Administration", since this term has a different connotation in French.

Footnote 4(i): Article 3(1)(b) should be clarified rather than Article 2(2) as the words "operate under the authority of a Contracting State" are ambiguous.

Article 2(3): The phrase "by any Annex" involves a contradiction between Article 1(1) (and those Annexes.....) and Article 2(3) (by any Annex) for

example as far as the application of Article 7 is concerned. This phrase should either be deleted or replaced by: "by Annexes 1 and 2".

Article 2(4): Sub-paragraphs a) and b) must be regrouped into a single sentence to avoid any contradiction, to read as follows: ".....howsoever caused, to the exclusion of:

- i) dumping
- ii) releases

Article 2(4)(b)(ii): This should read: "from the exploration, exploitation, storage and treatment.....". Some off-shore terminals, in fact, include slop storage tanks between the production and dispatch of the oil, which are connected with exploitation but do not perhaps form part of it in the strict sense of the term. The new wording would avoid any possible difficulty of interpretation.

Article 3(1)(b): Bearing in mind the comment on Article 2(2) footnote 1), the words "which operate under the authority" should be replaced by "which operate under the jurisdiction".

Article 3(2): It should be made clear that the second sentence does not refer to the Annexes by which the States are not bound, in accordance with Article 1(1).

Article 4: If Alternative II has the advantage of strengthening the implementation of the Convention, then the French Government cannot accept the present wording. In French law the legal authorities are free to decide whether or not to take proceedings: in order that this basic principle might be maintained, the French Government proposes the following wording:

1. Any violation of the requirements of the present Convention shall be penalised under the law of the Administration <sup>1/</sup> of the ship concerned, wherever the violation occurs. As soon as the Administration is informed of such violation, it shall refer the matter to its own legal authorities as soon as possible for proceedings purposes.

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<sup>1/</sup> "Autorité (in the French text) - definition given in Article 2(2).

2. Any Party to the present Convention shall penalise under its own legislation any violation of the requirements of the present Convention within its territorial waters. Whenever such a violation occurs that State shall, as soon as possible, either:

a) refer the matter to its own legal authorities for proceedings purposes, or

b) furnish to the Administration of the ship such information as may be in its possession to prove that a violation has occurred.

3. In the case provided for in sub-paragraph 2(b) the Administration of the ship shall inform both the State which has reported the violation and the Organization<sup>2/</sup> of the results of the proceedings.

4. No change.

Article 5: The French Government considers that the denial of access to a port might present certain dangers, and that it would be preferable to apply Article 5(2) which prevents the ship from sailing once it has entered the port. The French Government therefore proposes that paragraphs (2) and (4) of this article be re-worded as follows:

Paragraph (2): If a State which is party to the present Convention is not certain that a ship wishing to enter one of its ports or to use one of its off-shore terminals complies in every way with the provisions of the Regulations applicable to that ship, that State may request consultation with the Administration <sup>1/</sup> of that ship. The Administration shall transmit to it all the information in its possession to enable it to determine whether or not the ship complies with the provisions of the Regulations applicable to it.

If after such consultations it appears that the ship does not comply, entry to the ports or off-shore terminals may be subject to certain conditions to ~~guarantee~~ that such entry does not present excessive risks for the marine environment.

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<sup>1/</sup> Autorité: (French text) - definition given in Article 2(2).

<sup>2/</sup> Organization: definition given in Article 2(6).

Any State laying down such conditions shall inform both the Administration of the ship and the Organization <sup>2/</sup> accordingly.

Paragraph (4): A ship required to hold a certificate in accordance with the provisions of the Regulations is subject while in the ports or off-shore terminals of another State which is party to the present Convention to inspection by officers duly authorised by that State.

Such inspection shall be carried out in such a way as not to delay the ship unless it appears that the particulars of the ship or its equipment differ from those shown on that certificate, or if the ship does not carry on board a valid certificate.

Article 6 footnote 20: It does not appear to be necessary to revise Article 6 as suggested in footnote 20, having regard to Article 5 which deals with certificates: violations of the Conventions can be divided into two categories: violations in respect of the condition of the ship (provisions not consistent with the certificates, for example, Article 5); and violations in respect of the behaviour of the ship (unauthorised discharge, Article 6; oil record book, Annex I, Regulation 21(6) for example).

Article 6(2) footnote 21(1): Inspection should not be restricted to loading ports.

Article 6(2): The last sentence should be revised to the extent that the action to be taken does not only correspond to the flag State; an impression that could be given by the present wording. This looseness could be avoided by deleting the last phrase: "...for any appropriate action".

Article 6(3): In the light of footnote 23 the first sentence must be amended accordingly as the penal proceedings can be taken by the State which establishes the violation or by the flag State.

Article 6(4): It is not necessary, in French, to state that the contravention is "présunée (alleged)".

Article 6(5): The provisions of paragraph 5 must be mandatory. Footnote 28 cannot be upheld since ratification of the Convention by a State must express its general consent to these investigations.

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<sup>2/</sup> Organization: definition given in Article 2(6).

Article 7 footnote 29: A special Annex on Reporting should be avoided, as it would by its very nature be different from the present Annexes. On the other hand certain technical details in each of the present annexes might be considered.

Article 7 footnote 31: If this proposal were to be taken up, it might lead to excessive complications for often very little gain.

Article 7(5): This should read: "and to any other State that is affected or that may be affected".

Article 7 footnote 32: There are grounds for retaining the entire text.

Article 7 footnote 34: The addendum proposed in this footnote does not appear to be essential.

Article 7(7)(b): In the French text only, the words "le taux de concentration" should be replaced by "la concentration". Furthermore sub-paragraphs b) and c) should refer to the stowage position (mentioned in (9)), knowledge of which might be useful.

Article 7(8)(b): Replace "affected States" by "States which are affected or which may be affected".

Article 7(9) footnote 35: In no case can the obligation for making reports be addressed to governments.

Article 9(1): As Annex I, which is mandatory, and the Convention itself must enter into force at the same time, the words: "Upon the entry into force of Annex I" should be deleted.

Footnote 43 paragraph (3) of the proposed new article: In the French text the words "donner avis de sa décision a" (notice of such termination shall be given to) should be replaced by "informer de sa décision".

Article 10: The French Government prefers a compulsory procedure for the settlement of disputes and cannot therefore accept the provisions of Alternative III. As for referring disputes to the International Court of Justice, this would have certain disadvantages namely the length of the procedure and the technicalities of the Convention. It would in fact be preferable for the judges to be well acquainted with certain technical

practices. The French Government therefore opts in favour of Alternative II, in which connexion it has the following comments to make:

- an annex to an article that would have a different status from that of the other annexes to the Convention should be avoided. The settlement of disputes should be dealt with in a single article subdivided into paragraphs.

- in article 4(4) the words "or of the other parties" should be added.

- in article 6 the phrase referring to the remuneration of the members should be replaced by the following two paragraphs:

"- each Party shall be responsible for the remuneration of its Arbitrator and the other arbitration costs, including the costs of preparing its dossier".

"- the remuneration of the third Arbitrator nominated by the Arbitrators of each Party, or where relevant by the Secretary-General of IMCO, and any general costs incurred in the arbitration shall be borne in equal shares by each party. The Tribunal shall keep account of all its costs and shall submit a final account thereof".

Article 11(1)(b): Delete "in accordance with the provisions of the Regulations".

Article 11(1)(d): In the French text only, replace "les installations disponibles (available facilities) by "leurs possibilités".

Article 11(1)(e): In the French text only delete "tous" (all).

Article 11(2) footnote 48: This would be a very useful addendum.

Article 12(1): In order to make the French text consistent with the English text the word "importantes" (major) should be replaced by "très importantes" or "majeures". The provisions of footnote 49 effectively indicate the interest in these investigations.

Article 14: In view of the complexity of this Convention, it would be better to adopt Alternative II.

Article 15: The French Government is in favour of Annexes I and II being mandatory.

Article 15(3): In line 3 of the French text read "paragraphe 2" for "paragraphe 1".

Article 17: The French Government cannot accept the amendment procedures described in paragraph (2) of this Article. For the whole of the text it supports the comments made in footnote 55 and at the Conference will propose a draft article drawn up on the basis of these observations.

Article 18: The denunciation period for the Convention or any of its Annexes should be put at 5 years.

Article 19: Paragraph (1) of this article should consist of a more flexible formula whereby Governments might assume responsibility for a territory so as to cover the case of territories that form part of the parent State. It cannot in fact be said that the parent State is "responsible for the international relations". The phrase "any Contracting State responsible for the international relations of a territory" should be replaced by "any Contracting State, in cases where it assumes the international responsibility of a territory".



COMMENTS ON ANNEX I - REGULATIONS

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 1(1)	Delete the comma after "other than petrochemicals".	The presence of the comma would make it necessary to define petrochemicals and would not guarantee that Annexes I and II cover all of them without overlapping.
	Replace "and, without limiting the generality of the foregoing, .... to this Annex" by "listed in Appendix I to this Annex."	The substances covered by Annex I must be known in advance without ambiguity, and they must therefore be listed in Appendix I.
Reg. 1(1) note 1(ii)		The difference between persistent and non-persistent oil is very difficult to define. In spite of the merit of the arguments given in note 14 of Reg. 9 and its addendum (a note with which France was associated in the beginning), it would be better to have one system only, as big discharges of oil said to be non-persistent may have effects which are just as serious or more serious than similar discharges of persistent oil.
Reg. 1(5) note 2		The proposed deletion is acceptable.
Reg. 1(7) note 4		It is in fact impossible to appreciate the real intentions behind a major conversion.
Reg. 1(10)	In the French text read "pour des raisons techniques reconnues" and "de méthodes obligatoires particulières"...."	French text to be made consistent with the English text.
Reg. 1(16)	Replace "... l'effluent de cette citerne rejeté d'un navire immobile" (effluent therefrom discharged from a stationary tanker) by "l'effluent de cette citerne, s'il était rejeté d'un navire immobile ..."	The wording of the last sentence in the French text must be altered in order to be consistent with the English text.
Reg. 2(4)(a)	Replace "Any hydrofoil, air-cushion vehicle and similar craft ..." by "hydrofoils, air-cushion vehicles and analogous craft".	

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 2(4)(a) (cont'd)	Delete "and that they are acceptable to the Governments of the States to be visited by the ship".	This provision would cause considerable difficulties in practice. It is unnecessary to the extent that sub-paragraph (c) constitutes a "saving clause and ensures that an Administration is not excessively liberal.
Reg. 3(2)	Replace "Toute Administration" (French text) by "L'Administration" (or "L'autorité"). Delete "encore" from the French text.	
Reg. 4(1)	Replace "matériel d'armement" by "équipement". Replace "fully comply" by "fully comply, subject to the application of Regulation 3 ..".	French text only.
Reg. 6(1)	After "cause a ship to be surveyed" add "authorized to fly the flag of the State of that Government ..".	
Reg. 8(2)	Read "... il ne peut être délivré de nouveau certificat avant la date d'expiration du certificat initial". Replace "le matériel" by "l'équipement".	Harmonization of French and English texts.
Reg. 9 note 15		This note only adds confusion to the text and can be linked to the extent of national jurisdictions.
Reg. 9 note 16		The figure of 30 litres/mile can be adopted for sub-paras (1)(a)(iv) and (1)(b)(iii).
Reg. 9(1)(c)(v)	Read: "second voyage following the complete unloading of the cargo .."	It is possible to forbid any discharge from a ship which has partly unloaded and therefore has storage capacity for contaminated effluent.
Ref. 9(1)(a)(v) note 19		An interpolation formula is necessary if the multiplication of tankers of just under 100,000 tons deadweight is to be avoided.
Reg. 9(1)(a) last sub-para.	Replace "les mélanges équivalents aux ballasts propres" by "des mélanges équivalents à un ballast propre".	

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 9(1)(b)(vi)	Read: "the ship, if of (400) tons gross tonnage or above ..."	Regulation 16(3) does not make is compulsory for ships of less than 400 tons to be equipped with these installations.
Reg. 9(4)	Read: "The discharge shall not contain chemicals or other substances, in quantities or concentrations which are hazardous to the marine environment."	The present wording results in the use of any substances being forbidden on board. There are, however, substances whose use enables the discharge of oil at sea to be reduced, the rational use of which must be encouraged.
Reg. 9(5)	Replace "niveau" by "degré".	French text only.
Reg. 10(b)	Replace "armement" by "équipement".	French text only.
Reg. 10(c)	Read: "au rejet à la mer de substances contenant des hydrocarbures approuvées par l'Administration lorsque ..." (French text only).  Delete "as dispersants".	  There are other types of control substances.
Reg. 11(2) note 24		Whatever dates are adopted, the commissioning of segregated ballast tankers is a long term measure.
Reg. 11(2) note 25		This note is acceptable (cf. Reg.1(5)(a) note 2).
Reg. 11(2) note 26		The exception of ships operating in special areas is theoretically justified but complicated, and may be unnecessary insofar as tankers are not assigned to special areas. The rest of the proposed addendum is unacceptable as it constitutes a loophole for segregated ballasts.
Reg. 11(3)	Delete the exception of Reg. 9(1)(a)(vi).	Discharge monitoring and control systems are essential. They are already established and can easily be brought in before the entry into force of the Convention.

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 12(2) note 28		The spirit of this note is excellent.
Reg.12(2)(a)	In French text replace "les eaux de ballast sales et de nettoyage des citernes polluées" by "les eaux de ballast sales et de nettoyage des citernes". Replace "repair ports by "repair ports for	French text only.
Reg. 12(2)(b) 2nd para.	Read "Regulation 15" for "Regulation 13".	
Reg. 12(2)(c) note 29		The proposed addendum is useful.
Reg. 13 note 31		Any measures that might involve a lack of uniformity as regards the application of the Convention should be avoided.
Reg. 13 note 32		The proposed exemption is logical but perhaps unnecessary (see comments on Reg.11(2) note 26).
Reg. 13 note 33		The measures advocated are ineffective because they could increase the pollution; they might even be an extra hazard because of the risks of explosion.
Reg. 13(3)(b)		The draught should be specified (average, amidships).
Reg. 13(5)	Replace "of Regulation 15" by "of Regulation 15 or of <b>Regulations</b> 12 and 20". Delete the end of the sentence after "annex".	This ballast can be disposed of in shore facilities. Excessive with Regulation 21.
Reg. 14(2)	Delete the end of the sentence after "annex".	" " " "
Reg. 15(3)(a)	Delete "the oil content of".	There is no mention of oil content in Reg.9(1)(a) and the quantities of oil discharged are controlled directly.

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 15(3)(b)	Replace "additional" by "particularly large amount". Replace "Oil tanks" by "tankers" in the last sentence.	It is not clear from the present wording in relation to what the water is additional;
Reg. 15(3)(d)	Replace "réutilisation" by "recyclage" (recirculatory).  Delete "or when the discharge of residue ashore is intended".	French text only.  Unnecessary.
Reg. 15(3)(e)	Add at the end "in slop tanks"	
Reg. 15(3)(f)	Replace "The operation" by "The use".	
Reg. 16(1)	In the French text replace "en vue du satisfaire" by "conforme".	
Reg. 17	Add at the end "shore or floating" (reception facilities).	
Reg. 17 note 41		It would seem advisable to restrict the number of units characterizing the various thresholds of application of the regulations (tons gross tonnage, tons deadweight).
Reg. 18	In the French text, revise the title to read "Installations de pompage et de tuyautage des pétroliers pour le déchargement dans les installations de réception (ou à la mer)".	
Reg. 19	Add "or floating" after "shore ... (reception facilities)".	
Reg. 21(2)(a)(xi) and (2)(b)(iv)	Delete the word "routine".	The final objective is to avoid all routine discharge.
Reg. 21(3)	Read "Regulation 10" for "Regulation 12".	

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 21(4) note 44	Read at the end of the note "soit en anglais ou en français, soit une langue nationale et en anglais ou en français".	French text only.
Reg. 24(1)(b)(iii) note 47	Replace the year 1972 by 1974.	No date should be prior to the 1973 Conference. The staggering of dates in the 1971 amendments to the 1954 Convention will not be awkward in practice since all tankers ordered since 1972 already in fact comply with these requirements although they are not, legally, in force.
Reg. 25(1)(c)	Replace "excluding all residues" by "except for ... residues".	The wording of the last sentence is not clear, particularly in the French text.
Reg. 26		This Regulation ought to go into Chapter II. Furthermore it contains a number of unnecessary paragraphs in that they repeat regulations that apply to all ships, including therefore stationary ships. The paragraphs in question are (3) (covered by Regulation 1(16)), (4) (covered by Regulation 9(4)), (5) (covered by Regulation 10), (9) (covered by Regulation 19), (12) (covered by Article 7).
Appendix II to Annex I	Read "Regulation 24" in lieu of "Regulation 26" in the first paragraph.	
Certificate for oil tankers	In paragraph 3 replace "the load on top system" by "the retention of oil on board in accordance with Regulation 15".	The load on top system is neither defined nor mentioned in the Regulations.
Appendix III to Annex I - note 57	Read "Regulation 21" instead of "Regulation 2".	French text only.

COMMENTS ON ANNEX II

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 2(2)		The present text does not cover all situations. A ship may, without carrying a cargo of oil be carrying residues whose discharge is unauthorized (if it is in a special area for example); it must be subject to the relevant provisions of Annex I.
Reg. 3(2)	Add commas after "catégories" and "annexe".	French text only.
Reg. 3(3)		The Contracting Governments "involved" should be defined.
Reg. 5(1) note 4	In the second line of the French text read 0.1 per cent instead of 0.01 per cent.	French text only.
Reg. 5(1) note 5		The proposed addendum is unnecessary (see comment on Annex I, Regulation 9 note 15).
Reg. 5(1)(a)		The word "barges" has not been defined (same comment for Regulation 5(2)(a), Regulation 5(3)(a) and Regulation 11 note 20).
Reg. 5(1)(d)	Delete "le rejet s'effectue lorsque"	French text only (same comment for Regulation 5(2)(e) and Regulation 5(3)(e)).
Reg. 5(2)	Replace "However such mixtures may be discharged when" by "except when".	Consistency with the wording of Regulation 9 in Annex I. (Same comment for Regulation 5(3)).
Reg. 5(3)	Replace "d'eaux de ballast" by "de ballast propre".	French text to be consistent with English text.
Reg. 6(b)	Replace "armement" by "équipement".	Same comment for Regulation 10(2)(a)(i) (cf comment on Regulation 10(b) of Annex I).
Reg. 6(c)	Read "approuvées" for "approuvé".	French text only. The government approves the substances and not the discharge (cf comments on Regulation 10(c) of Annex I).

<u>Existing text</u>	<u>Proposed text</u>	<u>Comments</u>
Reg. 6(c) (cont'd)	Delete "when used for that purpose under the supervision of that Government."	Provision inapplicable in practice. The wording of this Regulation 6 must be brought in line with that of Regulation 10 of Annex I.
Reg. 8(2)(a)	In the third sentence replace "produits de lavage" by "effluents de lavage".	The purpose of the second sentence is not clear. French text only.
Reg. 9(3)	Read "Regulations 5 and 8" instead of "Regulations 5 and 9".	French text only.
Reg. 10(2)(b)		The present wording is not clear, as it even seems to apply to tankers which are not fitted with spaces for the carriage of noxious substances in bulk.
Reg. 12		In the French text only the word "stationnaire" must qualify both other craft operating in the marine environment and ships.
Appendix I		Explain the notation TLM
Appendix II	Instead of:	Read: (French text only)
	Page 117: acide chlorisulfonique acide fluorydrique	acide chlorosulfonique acide fluorhydrique
	Page 118 alcool de 2-éthoxyde alcool furfurylique iso - aldéhyde butyrique cétone d'éthyle amyl	alcool 2 - éthylhexylique alcool furfurylique aldéhyde isobutyrique éthyl- amyl cétone
	Page 119 dichloropropène mélange de dichloropropane (D.D. pour fumigation des sols)	} mélange de dichloropropène et dichloropropane { (D.D. pour désinfection des sols)
	Diisocyanate de toluène Ethanolamine de diméthyl (2 diméthylamine éthanol) Ethanolamine de monométhyle	toluylène diisocyanate { diméthyléthanolamine monométhyléthanolamine



Existing textProposed textCommentsAppendix II  
(continued)

Instead of:

Read:

(French text only)

Page 120: hydroxide de sodium  
Phenol nonylique  
Propylamine normal  
Sulfonate de benzène alkylique  
(chaîne directe)  
(chaîne indirecte)  
Térébenthine (bois)

hydroxyde de sodium  
nonylphénol  
propylamine normale  
alkylbenzènesulfonate  
(chaîne droite)  
(chaîne ramifiée)  
térébenthine (essence de)

Page 121: Tétraméthyle de plomb  
Tricrésylphosphate  
(Phosphate de tricrésyle)

plomb - tétraméthyle  
Tricrésyl phosphate  
(phosphate de tricrésyle)

## Appendix III

Instead of:

Read:

(French text only)

Page 122: Acrylate butylique normal  
Acrylate isobutylique  
Alcool de benzyle  
Cyanhydrine d'éthylène  
Cyclohexane d'isopropyle

Acrylate de butyle normal  
Acrylate d'isobutyle  
alcool benzylique  
éthylène - cyanhydrine  
isopropyl - cyclohexane

Page 123: Diphényle (oxide de  
déphynéline)  
Méthacrylate isobutylique  
Tétrachlorure de silicium

diphényle (dyphényloxyde  
(mélanges))  
méthacrylate d'isobutyle  
tétrachlorure de silicium

Existing text

Proposed text

Comments

COMMENTS ON ANNEX III

Reg. 1(3) Replace "les déchargements par rejet" by "les rejets par déchargement".

French text only.

Article 2(4)((a) makes the French word "rejet" correspond with the English word "discharge" (same comment for Regulation 7(1)).

Reg. 4(4) Delete "figure parmi les documents de bord du navire".

French text only.

Reg. 6 Add a comma after "dimensions".

" " "

Reg. 7(2) Delete "des eaux de nettoyage".

" " "

COMMENTS ON ANNEX IV

Reg. 1(1) Delete "également".

French text only.

Reg. 4(1)  
note 7

See comments on Annex I, Regulation 9 note 15.

Reg. 4(1)(b)(1)  
Replace "les taux de concentration" by "le nombre"

French text only

Reg. 4(2) Replace "ou d'eaux de déchets" by "ou d'eaux résiduelles ..."

" " " (to be consistent with Reg.1(4)(d)).

Appendix Replace "nombre de lits à bord" by "nombre de couchettes à bord".

" " " (to be consistent with Reg. 2(a)).

COMMENTS ON ANNEX V

Reg. 3(1)  
note 2

See comments on Annex I, Regulation 9 note 15.

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