



IMCO

INTERNATIONAL CONFERENCE ON
MARINE POLLUTION, 1973
Agenda item 7

CONSIDERATION OF A DRAFT INTERNATIONAL CONVENTION FOR
THE PREVENTION OF POLLUTION FROM SHIPS, 1973

Comments and proposals on a draft text
of the Convention

Submitted by the Government of the United Kingdom

Attached hereto are the comments of the Government of the United Kingdom on Annex II of the draft text of the International Convention for the Prevention of Pollution from Ships, 1973.

UNITED KINGDOM COMMENTS ON ANNEX II OF
FINAL DRAFT INTERNATIONAL CONVENTION FOR THE
PREVENTION OF POLLUTION FROM SHIPS (PCMP/8/3)

ANNEX II

Regulation 1

"Noxious substance": Bearing in mind that before a substance becomes subject to the requirements of the Annex it must be listed in Appendix II or provisionally assessed as falling into Category A, B or C under Regulation 3(3), it is possible to be specific in the definition of a noxious substance. The following is suggested:

"Noxious substance means any harmful substance designated in Appendix II to this Annex or provisionally assessed under the provisions of Regulation 3(3) as falling into Category A, B or C."

Regulation 3(3)

1. The sub-paragraph appears to presuppose that a substance will be categorized as A, B or C; it may, of course, be assessed as falling into Appendix III. Suggest substitute on page 98, line 2, "assessment" for "categorization", and in lines 8/9 "provisional assessment" for "provisionally assigned category".
2. In view of Article 17(3)(c) delete "for prompt circulation to all Contracting Governments for their information and consideration".
3. United Kingdom proposes the deletion of the square brackets.

Regulation 4

Sub-paragraph 2 refers to the discharge of mixtures containing Appendix III products but not to the substances themselves which are equally not covered by the provisions of Annex II. Suggest delete (2) and add a sentence to (1) in more general terms, e.g.:

"Such substances are not subject to any requirement of this Annex."

Regulation 5

1. United Kingdom would agree to the deletion of all square brackets.
2. Page 100, line 3: substitute "or" for "as".

3. To be consistent with Annex I, Regulation 9, amend lines 4/5 on page 100 to, "such substances shall be prohibited except when all the following conditions are satisfied". Similarly in Regulation 5(3).

Regulation 8

Footnote 14: The United Kingdom would oppose such a proposition, preferring the flexibility of the present wording of Regulation 8(4).

Sub-paragraph (6), line 2: add at the end of line, "aggregate of the".

Regulation 10

Sub-paragraph 2(ii): delete.

Sub-paragraph 2(iii): Renumber "2(ii)" and amend to, "a periodical inspection at approximately two-year intervals and normally coincident with the survey of safety equipment under Regulation 8 of Chapter 1 of the International Convention for SOLAS, but in any case at intervals of not longer than 2 $\frac{1}{2}$ years, which shall ... etc."

Appendix II

Heading of column III should refer to Regulation 5(1) of Annex II.

In the case of Carbon disulphide and Phosphorus (elemental) the "Residual concentration" in column III should be 0.01 (not 0.1).

Appendix III

It should be ensured that the list is as comprehensive as possible before the Convention is finalized. The United Kingdom is examining this.
