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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 Oil Companies
International Marine Forum

Introduction

We are of the view that the proposed Convention can best be analysed by a two-step approach:

- Firstly: by relating the major Convention goals to reasonable measures by which these goals can be attained; and
- Secondly: by examining the detailed draft provisions which are designed to assure the meeting of these goals.

We hereby provide you with such an analysis in the form of:

- (a) this cover note which concentrates on some of the major Convention items; and
- (b) comments and recommendations addressing specific draft Convention provisions.

The oil company members of OCIMF which own or charter approximately 90% of the world's tanker fleet are committed to conducting their tanker operations in such a manner as to preserve the marine environment. In order to eliminate harmful operational pollution and to minimize accidental pollution of the seas, OCIMF members have been working continuously to improve the practice of Retention on Board (often referred to as Load on Top) and in this regard they have expended considerable effort in the search for effective oil separation and overboard discharge monitoring equipment.

They have voluntarily promoted adherence to the strict discharge criteria of the 1969 Amendments to the 1954 Oil Pollution Convention and have conducted comprehensive pollution prevention training for their seamen. Significant advances have also been made in the areas of vessel design, manning and equipment for the protection of the marine environment.

OCIMF believes that the 1969 Amendments provided a realistic basis for regulation of discharge and were capable of enforcement. In furtherance of the 1969 amendments OCIMF has pledged its support for inspection of all tankers arriving at crude oil loading ports and particularly repair yards, and in 1971 put forward practical proposals in this respect. It is unfortunate that there has so far been insufficient governmental acceptance to bring these Amendments into force.

In order for further progress to be achieved, OCIMF is firmly convinced of the need for an international convention which will be more comprehensive than the 1954 Oil Pollution Convention as amended. It should contain discharge criteria, inspection and enforcement procedures, and vessel design and equipment criteria which will serve better to protect the marine environment. Furthermore, the variety of sources for operational discharges and the causes of accidents requires a Convention with a balanced combination of solution elements. Despite the attractiveness of a simple "one solution" approach to new oil discharge regulations, OCIMF believes that a balance of pollution abatement measures will be most effective and most acceptable to nations generally.

These measures must be so integrated as to produce effective results at the least burdensome economic penalty. This requires that undue duplication of measures be avoided. OCIMF recognizes that solutions for oil tanker discharge problems, although costly, must be found. But we believe that such solutions must clearly recognize the massive capital requirements associated with rapid growth in oil demand and related environmental protection needs. Undoubtedly these capital requirements are also of great significance to many nations. Consistent with the above, the Convention should be conducive to rapid adoption, implementation and amendment, and its provisions easily understood and capable of uniform interpretation and application throughout the world.

Operational discharges, characterized by some governments as "intentional", are defined as oil or oily mixtures discharged into the oceans during normal vessel operations. It is our view that the provisions relating to such discharges should form the heart of the Convention. These discharges would include dirty ballast from uncleaned tanks, tank washings, cargo sediment, engine room bilge and fuel or lubricating oil sediments from oil purifying systems. Such discharges become of increasing importance when we consider that energy growth trends towards the end of the century indicate a near doubling each decade of oil movements by sea with a preponderance of seaborne movements as crude oil rather than refined products.

In the crude oil trades dirty ballast and tank washings are the main source of the operational discharges. In the product trades such discharges may occur when tanks are cleaned preparatory to changing product grades. For all tankers washing of tanks is required prior to major overhaul.

With these basic considerations in mind, the remainder of this letter will, for the most part, concentrate on those Convention provisions in Annex I which pertain to operational discharges from oil tankers.

Definition of Oil

OCTMF supports the inclusion of all petroleum oils and suitable controls in Annex I to the Convention with a distinction being made between persistent and non-persistent oils as set out in the addendum to footnote 14, pages 92-95.

Discharge Criteria

We strongly support a Convention provision including the standards as contained in Regulation 9 for persistent oils. Experience of many of our members shows that the 1969 Amendment standards can be met by existing tankers which practice Retention on Board. Oily discharges made in conformity with them contain such limited quantities and concentrations of oil that harm to the marine environment, if any, will be minimal.

As to non-persistent oils, the Forum supports their being handled in accordance with the principles stated in footnote 14 to Regulation 9 at pages 92-95 of the final draft. In the Forum's view the discharge of non-persistent oils should be prohibited unless made twelve miles or more from shore and in not less than twelve metres of water with the vessel proceeding at a minimum speed of seven knots. If these standards are met together with the operational procedures contained in footnote 14, on the basis of available scientific information, we believe that discharges of non-persistent oils will be sufficiently evaporated or otherwise dispersed so as to not cause harm to the marine environment.

Retention on Board (Load on Top)

The practice of retention on board is being used by oil tankers with increasing success. The recent publication by OCTMF and ICS of the "Clean Seas Guide", a manual containing detailed instructions for the use of this technique, is one demonstration of the firm commitment of the tanker world to the improvement of this system.

Voluntary loading port inspection of tankers now practised by some of our members is another. These inspections, applied to all ships loading at certain terminals, are showing the practicability of detecting the poor performer and are achieving substantial improvement in oil retention efficiency. From this experience OCTMF is convinced that such inspections universally required and backed by the enforcement procedures available to government would bring the Retention on Board system to 100% adherence and so achieve substantial further reductions in operational discharge. Finally, with development of improved on-board monitoring instrumentation and oil/water separation procedures for cargo residue, operational pollution of the seas by tankers utilizing these practices could be virtually eliminated. The Forum strongly recommends that a Convention requirement for Retention on Board on those vessels and voyages on which it can reasonably be practised be specified in Regulations 11(1) and 15.

We also recommend specific regulations requiring a system of in-port (including repair ports) inspection and requirements for the control of the residue handling procedures by instruments meeting agreed standards. We would urge that governments adopt the "Clean Seas Guide" as the appropriate operational manual referred to in Regulation 15(3)(f) of Annex I.

Limited Shore Reception Facilities

Retention on Board is not always practical for

- (i) tankers engaged in trades with short ballast runs or on routes solely within coastal areas within which discharge of oily ballast waters is not permitted.
- (ii) product tankers which can utilize a variation of the retention on board technique practised by crude carriers but which cannot generally mix accumulated oily slops with new cargoes because of the possibility of product contamination.

Limited shore reception facilities to accommodate the operational requirements of these vessels should be available at their loading ports. Furthermore, it is the view of OCIMF that it is imperative that shore reception facilities with sufficient capacity to receive oily slops and residues from pre-repair tank cleanings are provided at all tanker repair ports. Consequently, Regulation 20 should be revised to accomplish the above purposes and desirably should include a schedule for implementation.

OCIMF strongly opposes the concept of total shore reception facilities as the primary measure to accomplish the Convention's ultimate goal with regard to operational discharges. If the shore reception provisions contained in Regulations 11(i)(c) and 20 remain in their present form as an optional pollution control measure, it is possible that the wording could be interpreted as a requirement for total shore reception facilities. This would represent a duplicate, inflexible and costly measure which, if implemented, would undoubtedly cause an increase in coastal pollution concentrations in loading areas. Finally, it would not be a viable solution for offshore terminals which will continue to increase in number and in distance from shore with expanded crude oil movements and vessel size.

Segregated Ballast

Regulations 11(2) and 13 of Annex I of the final Convention draft are designed to require large oil tankers which will be delivered at about the end of the decade to be equipped with segregated ballast tanks of sufficient capacity to enable them to operate safely on ballast voyages under weather and sea conditions they may normally be expected to encounter without carrying water ballast in cargo tanks. We firmly believe that the practice of retention on board combined with limited shore reception facilities provide the best short term measures for operational oil pollution abatement. With perfected on-board monitoring instrumentation and control devices, these measures potentially represent viable long term solutions as well. However, in the absence of such perfected devices at this time, OCIMF is prepared to accept inclusion of a mandatory segregated ballast provision in the 1973 Convention for large crude tanker newbuildings. Because segregated ballast is to a large extent self-enforcing and will substantially reduce the mixing

of oil and water on new crude tankers, OCIMF views it as the most appropriate long term solution presently available for the abatement of operational pollution from these future vessels. Whilst we recognize that some time will be needed for ratification of the Convention, a mandatory segregated ballast provision along the lines of Regulation 11(2) should be capable of practical implementation, at least in its initial stage, by the end of the decade.

Level of Ballast

OCIMF is opposed to a Convention provision which specifies minimum ballast levels in relation to deadweight or displacement as presently contained in Regulation 13(3). The Forum supports a provision relating ballast capability to adequate draft, expressed in simple design parameters and a specific proposal to this end is included in the detailed comments attached hereto.

This approach to segregated ballast in newbuildings will encourage logical design processes to take advantage of technological advances and will result in the most cost effective means of implementing the segregated ballast concept.

Minimizing of Accidental Outflow

OCIMF is firmly opposed to a Convention provision which requires other specific design features such as double bottoms or double skins. It is our contention that the studies already conducted and analysed at the preparatory meetings clearly indicate that both double bottoms and double skins represent very costly measures which would in many accident circumstances reduce the stability and survivability characteristics of tankers, thereby increasing the chances of turning groundings and collision accidents into total ship losses. Accordingly, while OCIMF recognizes the need for a reasonable degree of tanker sub-division to ensure safety, we are convinced that the basic premise of preventing accidental oil pollution through ship design features of a protective skin nature is not technically sound.

Consistent with the foregoing, OCIMF believes the most effective way of minimizing accidental pollution is through the prevention of accidents. We support the philosophy set forth in study document PCMF/3 which not only presents a comprehensive review of all IMO activities which would contribute to the minimization of accidental spillages of oil but also recognizes that a general improvement in marine safety is one of the most important aspects for the prevention and abatement of marine pollution.

Special Areas

Finally, we feel the subject of Special Areas covered in Regulation 12 deserves specific comment. The Forum is convinced that with proper implementation of the technical abatement measures of retention on board for oil tankers, segregated ballast for new large tankers and limited shore reception facilities for product, short haul and coastal crude movements and at repair ports, the need for giving special treatment to those few geographical areas now designated in Regulation 12 will be obviated.

Furthermore, we believe that the inclusion of a special area concept in the Convention carries with it the possibility of unreasonable and unwarranted proliferation. Implicit to this approach to the problem is OCEC's acceptance that the multiplicity of short hauls of crude oil and the many ship repair ports in areas such as the Mediterranean will require a considerable addition to the in-port reception facilities presently available. Specific proposals for delineating the basis on which such shore reception facilities should be provided will be found in our comments on Regulation 20 of Annex I.

Conclusion

We have endeavoured to treat in this cover note what we consider to be the most important aspects of the proposed 1973 Convention related to oil tankers. Further comments and recommendations respecting these and other Convention items are detailed in the attached provision by provision submission.

RECOMMENDATION OF OIL COMPANIES INTERNATIONAL MARINE FORUM
ON THE DRAFT TEXT OF AN INTERNATIONAL CONVENTION FOR THE
PREVENTION OF POLLUTION FROM SHIPS 1973

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

PREAMBLE, Footnote 1/

We support the present format of the Convention i.e. a composite document, with technical Annexes, incorporating more rapid means of amendment rather than further amendment of the 1954 Convention with its much slower response to amendment.

ARTICLE 2 (4)(a), Footnote 5/

Agree with text in draft; additional wording not necessary.

ARTICLE 2 (5)

Delete present text and substitute the definition contained in the 1954 Convention viz:-

"Ship means any sea-going vessel of any type whatsoever including floating craft, whether self-propelled or towed by another vessel, making a sea voyage".

In view of the limited examination given in the preparatory work to problems related to pollution from "ships" not making a sea voyage, we strongly recommend that the 1954 Convention definition be retained for the time being and that further consideration be given to this subject with a view to producing appropriate regulations therefor, either as an amendment to Annex I or as a new Annex to the present Convention.

ARTICLE 5 (2)

Insert "a suitable" before "repair yard" in last line and delete words "nearest" and "available" to read "a suitable repair yard"

The nearest repair yard may not be able to undertake the necessary work either due to lack of facilities or because of pressure of work.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

Footnote 14/

Footnote 16/

ARTICLE 5 (3)

ARTICLE 5 (4)

ARTICLE 5 (5)

See proposal for Para (2) above.

Footnote 19/

ARTICLE 6 (1)

Delete "all" in third line.

ARTICLE 6 (2)

Insert "and repair" after word "loading" at the end of the line.

Footnote 21/

OCIMF COMMENT

Prefer existing text.

See proposal for para (2) above.

See comments on Footnote 19.

Since States have the right to refuse vessels entry to their ports it would seem unnecessary for such a provision to be included in the Convention. If the provision is, however, included it should be permissive only. Thus "may" should be retained and "shall" deleted.

The comment against para (4) is equally applicable to this paragraph.

If a provision of this nature is retained the wording of Footnote 19 is much preferred to that in the text.

To avoid unnecessary duplication of means of detection and monitoring.

For an inspection system to be as complete as possible, ships entering repair ports after discharge of cargo should be subject to inspection for compliance with the provisions of the Convention.

See recommendation above.

HAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

Footnote 22/

ARTICLE 6 (3)

Insert after "master" the words "agent or owner" in last line.

ARTICLE 6 (5)

Retain "may" delete "shall".

Footnote 27/

ARTICLE 7 (1)

Insert "a significant quantity of a" before "harmful substance" in last line.

Footnote 30/

OCIMF COMMENT

Prefer retain present text of para (2).

If the alleged contravention occurs when the ship is outward bound it may not be practicable to notify the master. However in such cases the ship's agent in the port will be known and such information should be passed to him.

It may not be possible for the State to carry out an inspection due to local circumstances. Further it may not consider the report sufficiently conclusive to merit delaying the ship for the purpose. The decision to investigate should be at the discretion of the State - See also comment on Footnote 27.

We agree para (5) should not be mandatory and therefore the wording of Footnote 27 may be preferable.

This will prevent proliferation of reports of minor incidents and preserve the sense of emergency for major accidents or spills.

See comment under Article 7 (1) above.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

ARTICLE 7 (2)

Footnote 31/

This would seem to place an impossible burden on Masters of ships not involved and could well result in inaccurate and misleading information being transmitted at a time when it is essential that factual data be obtained. This should be left to ships involved.

ARTICLE 7 (6)

Footnote 32/

See recommendation under Para (1). If reports are confined to spills of significant quantities or the threat thereof the proposals in this footnote are unnecessary.

Footnote 33/

This would appear to be unnecessary in the light of Para (1).

ARTICLE 7 (7)

Footnote 34/

The qualification to the wording suggested herein is entirely logical and should be included since it is more important to transmit information as it becomes available rather than wait for all facts and thus delay some.

ARTICLE 7 (9)

Delete 'charterers' insert "operators" in line 1.

This responsibility should not be placed on the charterer since he may not be in possession of the information at the appropriate time. In the absence of the owner, the operator of the vessel will always be in a position to make this report either direct or through the agent.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

Footnote 35/

See comment under para (9) above.

ARTICLE 8

Footnote 36/

Since the desire is for uniformity in international regulations applied to shipping, the text as drafted in Para (1) and Para (2) seems the most appropriate. Whilst we would not comment on the possible deletion of Para (1) suggested in Footnote 36 (i), we would strongly recommend retention of Para (2). We are therefore opposed to the suggestions in Footnote 36 (ii) and (iii).

ARTICLE 8 (2)

Retain present text deleting square brackets.

The present wording should be maintained to ensure the free flow of international trade and to prevent unnecessary complications due to proliferation of different or incompatible national regulations.

Footnote 38/

See comment on Article 8 (2) above.

Footnote 39/

Strongly recommend retention of words "and manning" and deletion of square brackets.

ARTICLE 12 (1)

Footnote 49/

Prefer existing text.

ARTICLE 12 (2)

Footnote 50/

Prefer existing text.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

ARTICLE 15 (1)

Delete square brackets round text of last sentence retaining wording therein.

Footnote 54/

ARTICLE 16 (1)

Delete square brackets retaining figures therein.

Footnote 54/

ARTICLE 17 (3)(a)

Footnote 58/

ARTICLE 17 (3)(a)(iii)

Footnote 60/

ARTICLE 17 (3)(a)(vi)

Footnote 62/

ARTICLE 17 (3)(b)(iii)

Footnote 66/

The retention of this sentence is essential to the Convention as presently drafted since it clarifies the intent of Article 17 (3)(d) when read in conjunction with Article 16(2) to which Article 17(3)(d) refers.

Prefer text as presently drafted.

We support the proposed basis for entry into force criteria contained in present draft.

Prefer text as presently drafted.

We consider that whilst tacit acceptance procedures are appropriate to technical Annexes, amendment of Convention Articles should be subject to explicit acceptance.

Prefer retain text as presently drafted.

Prefer retain text as presently drafted.

Prefer retain text as presently drafted.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

ARTICLE 17 (3)(b)(vi)

Footnote 68/

Footnote 70/

ARTICLE 17 (3)(b)(vii)

Footnote 71/

ARTICLE 17 (3)(c)(iii)

Footnote 74/

OCIMF COMMENT

Prefer retain text as presently drafted.

We would support the contention contained herein.

Prefer retain text as presently drafted.

Prefer retain text as presently drafted.

ANNEX I

REGULATIONS FOR THE PREVENTION OF POLLUTION BY OIL

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

CHAPTER I

GENERAL

REGULATION 1 (1)

Replace this paragraph with the following:

"(1) 'Oil' means petroleum in any form including crude oil, residual fuel oil, sludge, oil refuse and refined products (other than petrochemicals, which are subject to the provisions of Annex II of the present Convention). For the purposes of Chapter II of this Annex oil shall be divided into two categories. The list of oils carried in bulk and presently categorised is set out in Appendix I to this Annex".

Footnote 1/

REGULATION 1 (5)(a)

Footnote 2/

We strongly support the division of petroleum oils into two categories - persistent and non-persistent - with different control methods specified for each group. A recommended list of oils in each category is included in this submission in the comments upon Appendix I. Consequential changes may also be necessary in cross references to Regulations.

Prefer to retain the present text as drafted with Annex I referring only to petroleum oils. In view of the limited and specialist carriage of animal and vegetable oils it is more appropriate to include such materials in Annex II Noxious Liquid Substances in Bulk (other than Oil).

See comments on Regulation 1(1) above.

Prefer to retain existing text in the draft.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 1 (5)(b)

Delete square brackets and delete "three" retain "five".

Prefer five years in view of potential backlog of deliveries from yards.

REGULATION 1 (7)(iii)

Insert "in order to avoid compliance with the requirements of this Annex for new ships" at the end of the present text.

This is a desirable clarification of intent and should prevent mis-interpretation of present text.

See comment under 7(iii) above.

REGULATION 1 (10)

Delete entire sub-paragraph.

For detailed reasons for this recommendation please refer to cover document submitted with these comments.

REGULATION 1 (16)

Delete 15 and insert "25" in third line from end.

In our opinion 25 parts per million is a more realistically obtainable figure.

REGULATION 1 (22)

Delete "Summer load waterline"

Insert "the geometric summer freeboard loadline" in line 2.

Since "deadweight" is used in determination of values in several Regulations in Annex I such as Regulations 9, 13, and 24 "deadweight" must be defined in a precise way not subject to differing interpretations. While with existing freeboard draft tanker designs there is little chance of differing interpretation, if segregated ballast tankers evolve in the future they will almost certainly have excess freeboard and therefore a substantial range of choices could be made for "Summer Load Water Line" in what would otherwise be identical tankers.

The proposed change should eliminate such differing interpretation.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

REGULATION 2 (1)

Footnote 9/

REGULATION 4 (1)(c)

Footnote 11/

REGULATION 8 (2)

Footnote 12/

CHAPTER II

REQUIREMENTS FOR CONTROL OF OPERATIONAL POLLUTION

REGULATION 9

Footnote 14/

OCIMF COMMENT

See comments under Regulation 26

See comments under Regulation 26

In view of the pattern of trade of many oil tankers provision should be made in this regulator for extension of the certificate. The extension provisions of SOLAS 1960 Chapter I Part B Regulation 14(c) and (d) should be adopted.

See comments under 4(1)(c) above.

See comment on Footnote 12.

We support the suggestion that wording conforming with SOLAS Chapter I Regulation 14 be used.

OCIMF firmly supports the view that the discharge of non-persistent oils should be governed by less stringent criteria than those applicable to persistent oils. It has not been shown that the discharge of non-persistent oils warrant the same treatment as persistent oils, or that they create the same degree of harm to the environment.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 9 (1)

Delete "oil or oily mixtures" in line 2 insert "oils in Category 1 as defined in Regulation 1(1) of the Annex or oily mixtures containing such oils."

In relation to the definition of "oil", OCIMF advocates that oil should be divided into two categories, category 1 representing persistent oils and category 2 representing non-persistent oils respectively. It is therefore proposed that the criteria contained in 9 (1) should be applicable to category 1 oils only.

REGULATION 9 (1)(a)(ii)

Delete square brackets.

As indicated in the covering letter OCIMF favours universal application of the discharge criteria in the 1969 Amendments, and believes that strict observance will reduce to minimal proportions or eliminate altogether harm to the environment. It is not considered that further restricting the criteria will significantly assist, but that enforcement of the existing criteria would achieve better results. OCIMF therefore supports retention of the figures throughout this paragraph.

Footnote 16/

See comment under 9 (1)(a)(ii).

REGULATION 9 (1)(a)(iii)

Delete this sub-paragraph

In accordance with the view expressed under 1 (10) that Special Areas are not necessary, the reference here should be deleted.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 9 (1)(a)(iv)

Delete square brackets

See comment under 9 (1)(a)(ii).

REGULATION 9 (1)(a)(v)

Delete present text and insert:

(v) the total quantity of oil discharged into the sea which may be permitted only between successive unloadings of the total loaded cargo shall not exceed:

It is considered that the present wording is not clear, and suggested redraft is proposed to clarify the intent.

Footnote 17/

See proposals for Regulation 9 (1)(a)(v).

REGULATION 9 (1)(a)(v)(1)

Delete square brackets.

Change the words "of the total quantity of the cargo of which the residue formed a part" in sub-paragraphs (1) and (2) to read "of the total carrying capacity of the ship".

In relating the quantity that may be discharged to the quantity of cargo carried, no account is taken of the fact that the same number of cargo tanks may be employed for the carriage of a **part** cargo as would be required for a full cargo, so that the tank washing required would be the same, and would result in a similar quantity of residue. For practical reasons, therefore, OCIMF prefers reference to the carrying capacity of the ship.

As indicated under 9 (1)(a)(ii) OCIMF accepts the figures stated. OCIMF does not believe that there is any necessity for an interpolation formula, as suggested in Footnote 19.

REGULATION 9 (1)(a)(v)(2)

Delete square brackets

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

Footnote 18/

Improvements in the design of ships enables the more restrictive criteria to be met, although there may be difficulties for existing vessels. OCIMF accordingly oppose the proposal in the footnote.

Footnote 19/

Prefer retain text in draft Convention.

REGULATION 9 (1)(a)(vi)

Change the words "has in operation" to "is equipped with".

A mandatory requirement that no discharge should be permitted unless the monitoring and control system is in operation could introduce unnecessary difficulties under some circumstances e.g. in the event of a breakdown of equipment. OCIMF is satisfied that the discharge of a substantial part of the settled water from a tank can be made without monitoring and without risk of breach of Convention requirements.

REGULATION 9 (1)(a)(vii)

The second sentence qualifies the whole of subsection (a) and should therefore not be inset under (vii).

Insert after "pumproom bilges" the words "unless such oil or oily mixtures have been combined and discharged in accordance with this sub-paragraph."

In tankers oil from machinery space bilges may be mixed with oil from cargo pumproom bilges, in which event it is considered that the mixture should be treated in accordance with the criteria in 9 (1)(a), and not have to be dealt with in accordance with 9 (1)(b).

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 9 (1)(b)(ii)

Delete square brackets.

As indicated under 9 (1)(a)(ii) OCIMF accepts the figures for discharge criteria, without further restriction.

REGULATION 9 (1)(b)(iii)

Delete square brackets.

As indicated under 9 (1)(a)(ii) OCIMF accepts the figures for discharge criteria, without further restriction.

REGULATION 9 (1)(b)(iv)

Delete square brackets.

As indicated under 9 (1)(a)(ii) OCIMF accepts the figures for discharge criteria without further restriction.

REGULATION 9 (1)(b)(v)

Delete this sub-paragraph.

See comments under 9 (1)(a)(iii).

REGULATION 9 (1)(b)(vi)

Delete "and control" in line one.

It is considered unnecessary to have a requirement for control as well as for the monitoring of discharges - see comments under 16 (v).

REGULATION 9 (2)

Delete this paragraph and insert a new paragraph:

(2) Subject to the provisions of Regulation 10 of this Annex, any discharge into the sea of oils in Category 2 as listed in Appendix I to this Annex or mixtures containing such oils from oil tankers to which this Annex applies shall be prohibited except when all the following conditions are satisfied :

See comments under 1 (10).
See comments under 9 above.

It is apparent from the criteria suggested in the Addendum to Footnote 14 governing the discharge of clean oils that the prime purpose is to ensure reasonable dilution and dispersal of such oils. OCIMF accordingly commends for consideration this draft text embodying the suggested criteria.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

- (a) the cargo tanks have been stripped and lines drained ashore to the maximum extent possible;
- (b) the oil in cargo pipelines is drained or flushed back into appropriate cargo tanks;
- (c) the oil in cargo tanks is diluted by the addition of a volume of water of not less than 1/100 of the total volume of the tanks involved;
- (d) the tanker is proceeding en route at a speed of at least 7 knots;
- (e) the discharge is made with the tanker not less than 12 nautical miles from the nearest land and in a depth of water of not less than 12 metres.

REGULATION 9 (4)

Delete "which are" in line 2 and insert "in sufficient quantities to be"

Without qualification, the requirement in the first sentence that the discharge shall not contain chemicals which are hazardous to the marine environment could be interpreted as meaning that no chemicals might be used if they can be shown to be in any way hazardous, notwithstanding that when diluted in the discharge there is no hazard.

REGULATION 11 (1)

Replace this paragraph with following:

"Every oil tanker engaged in the carriage of oils in category 1 shall operate under the following methods to comply with the discharge criteria specified in Regulation 9 of this Annex, subject to the provisions of paragraphs (2) and (3) of this Regulation; Either (a) segregated ballast tanks specified in Regulation 13 of this Annex; or (b) retention of oil on board specified in Regulation 15 of this Annex.

OCIMF believes that the prime methods of control should be segregated ballast tanks or retention of oil on board. In recognising that the retention of oil on board cannot always be practised, provision is made for disposal ashore in such cases.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

In cases where the circumstances do not permit the procedure for retention of oil on board to be carried out there may be in-port disposal to shore reception facilities specified in Regulation 20 of this Annex, provided that where oily residues have been concentrated in accordance with Regulation 15 of this Annex, such oily residues may be discharged to shore reception facilities specified in Regulation 20 of this Annex".

Insert new paragraph as follows:

"Every oil tanker engaged in the carriage of oils in category 2 as listed in Appendix I to this Annex shall comply with the discharge criteria in Regulation 9 (2) of this Annex".

REGULATION 11 (2)

Insert "Operating in accordance with Paragraph (1) of this Regulation", after the words "100,000 tons deadweight and above".

Delete square brackets on tonnages.

Delete square brackets on dates.

This paragraph is proposed in order to deal with the situation arising from the division of persistent and non-persistent oils into two categories.

This is a change consequential upon the proposal that the provisions of Regulation 11 (1) shall be applicable to persistent oils only.

OCIMF accepts the tonnages and dates as stated.

It is necessary to have regard to the practicalities of the position regarding the introduction of mandatory segregated ballast. OCIMF supports retention of the dates stated, and is opposed to the dates in Footnote 24 as being unrealistic.

See comments under Regulation 1 (5).

The suggestion in Footnote 26 has not been considered by OCIMF.

Footnote 24/

Footnote 25/

Footnote 26/

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 11 (3)

Insert "Operating in accordance with Paragraph (1) of this Regulation" after the words "every oil tanker."

Delete 2 insert 3

See comment under Regulation 11(2)

REGULATION 12

Delete entire regulation.

The cover document attached to this submission sets out the alternative solution proposed by OCIMF. See also our comments and proposals under Regulation 20 of Annex I.

REGULATION 13 (1)

Insert "and combination carriers" after "Oil tankers" in first line.

Consistent with Regulation 11 (2)

REGULATION 13 (2)

Footnote 33

We strongly oppose any proposal of this nature for the reasons set out in the cover document attached to this submission under the heading "Minimising of Accidental Outflow".

REGULATION 13 (3)

Delete existing text. Insert

"(3) The minimum capacity of the segregated ballast tanks shall be such that in the ballast condition the propeller can be completely immersed with a trim no greater than 0.015L, and provided further that the mean draft using segregated ballast only can be such as to satisfy the following formula:

See "Level of Ballast" section in cover document.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

$$d_m = 1.8 + 0.018L$$

in which:

d_m = mean draft in metres

L = length as defined in Regulation 1 (18) of this Annex, in metres.

Values for d_m as a function of L are given in the table below:

<u>L</u>	<u>d_m</u>
200	5.4
250	6.3
300	7.2
350	8.1
400	9.0

Footnote 34/

Footnote 35/

REGULATION 13 (4)

Delete existing text. Insert

"(4) Any oil tanker or combination carrier which is not subject to the provisions of Regulation 11 (2) of this Annex shall be qualified as a segregated ballast tanker referred to in Regulation 11 (1)(a) of this Annex provided that it complies fully with the requirements of paragraphs (2) and (3) of this Regulation."

REGULATION 13 (5)

Insert at end of existing text:

"Connections between the ship's ballast loading system and cargo tanks used under this provision shall be so arranged that they can be sealed in a way still permitting rapid ballast handling but sufficient to indicate when such seals have been broken to permit ballast in cargo tanks".

See proposed redraft of Para (3)

See proposed redraft of Para (3)

We believe this revised wording represents a simplification of wording without change of substance.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

Insert new paragraph

"(6) All ballast conditions specified in paragraphs (2) and (3) shall be achievable with bunker tanks empty".

Footnote 36/

This proposal represents a simple means by which inspection can establish that the convention has or has not been complied with. See proposal for amending para 5.

REGULATION 15

References to Regulations 9 and 11 in this Regulation should be changed to Regulations 9 (1) and 11 (1).

These changes are consequential upon the division of persistent and non-persistent.

REGULATION 15 (3)(b)

Delete "Oil tankers over 100,000 tons deadweight shall be provided with at least two slop tanks.

In the light of the requirement in Para (2) for slop tanks to be approved by the Administration and the detailed provisions in Para (3)(a) and (b) this sentence is unnecessary. It could also inhibit development of improved slop handling facilities.

REGULATION 15 (3)(d)

Delete "automatic" in first line.

Automatic monitoring is not necessary and in the present state of the art is impractical.

Delete "either when the recirculatory system is used or when the discharge of residue ashore is intended".

This wording is unnecessary and its retention would be likely to obscure the intention of this paragraph.

Delete "permanent" from last line and Delete square brackets round last sentence.

All that is required is a record of the monitored effluent to be retained with the Oil Record Book.

Footnote 37/

This visual indicator should not be required in addition to the monitor.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 15 (3)(f)

See covering memo.

REGULATION 16 (5)

Delete "and control" in first line and from "and shall" in second line to end of first sentence.

On a practical basis we doubt the need for a control as well as a monitoring system for bilge water or the availability of reliable equipment suitable for this service.

Present experience with so-called automatic cut-off devices for this type of service would indicate that they are unreliable and engender a false sense of security in operators. The reference to the recommendation in Part B. 3.1.11 in A.233 (VII) adequately covers the position.

Delete "permanent" in penultimate line and delete the square brackets.

See comment under Regulation 15 (3)(d).

Insert new paragraph:

(6) The equipment specified in this regulation shall be provided before the expiry of 3 years from the date of entry into force of this Convention.

To complement requirements of Regulation 11 (3).

REGULATION 17

Insert "which cannot be dealt with otherwise in accordance with the requirements of this Convention" after "spaces" at the end of first sentence.

There are techniques at an advanced state of development which will permit disposal of sludge otherwise than into tanks for disposal ashore. The regulation should permit this type of disposal, the provision of tanks should only be required in the absence of other means of disposal within the terms of the Convention.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 18

We would wish to see the entire Regulation deleted. See "comments" column for reasons.

This Regulation is considered to be unnecessary since:

- (a) Discharge ashore is carried out through the ship's cargo lines.
- (b) In view of the increased freeboard of segregated ballast ships it may be undesirable to lead lines on to the open deck.
- (c) With the requirement for monitoring and recording discharges contained in this convention it is unnecessary to require discharges to be above the waterline. Since the lines would be used for discharge of clean ballast in port approaches this could constitute a hazard to other small shipping.

Footnote 42/

See comments above.

REGULATION 19

This regulation should be made applicable only to ships other than tankers.

We strongly doubt the value and practicability of this proposal. For oil tankers it does not seem logical in view of technological improvements in design to restrict the future flexibility of the tanker industry by laying down such detailed standards. Virtually all tankers and oil receiving ports carry a supply of reducers to enable ship connections and shore hoses or discharge pipes to be matched.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

REGULATION 20 (1)

Insert at the end of paragraph 1 "subject to the provisions of paragraphs (2) and (3) of this Regulation."

REGULATION 20 (2)

Delete existing text of Para (2) and Insert

"(2) The facilities provided in accordance with paragraph (1) of this regulation shall apply only to:

(a) All terminals which load crude oil tankers that have prior to arrival completed a ballast voyage of not more than 48 hours or not more than 800 nautical miles.

(b) All terminals which load oils in Category I as defined in Appendix I to this Annex other than crude oil.

(c) All terminals which load oils in Category II as defined in Appendix I to this Annex to the extent that vessels loading therefrom are unable to meet the operational requirements of Regulation 9 (2).

(d) All ship repair ports.

(3) The minimum capacity for the shore reception facilities shall be as follows:

(a) Crude loading terminals shall have sufficient shore reception facilities to receive oil and oily mixtures which cannot be discharged in accordance with the provisions of Regulation 9 (1) from all tankers in short and coastal trades as defined in paragraph 2 (a) of this Regulation.

(b) Product loading terminals shall have sufficient shore reception facilities to receive oil and oily mixtures which cannot be discharged in accordance with the provisions of Regulation 9 (1) and 9 (2) from all tankers which load oils referred to in Paragraph 2 (b) and 2 (c) of this Regulation.

(c) All ship repair ports shall be provided with shore reception facilities sufficient to receive all residues and oily mixtures as remain for disposal from pre-repair tank cleaning.

The proposals in Column 2 endeavour to put into Convention language the philosophy expressed in detail in the cover document enclosing these comments.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

(4) The shore reception facilities prescribed in (2) and (3) shall be made available no later than years from the date of entry into force of this Convention.

REGULATION 20 (3)

Renumber to (5)

REGULATION 21 (2)(a)(iii)

Delete

See comments relating to Appendix III
Not necessary.

REGULATION 21 (2)(a)(v)

Delete

Not necessary.

REGULATION 21 (3)

Delete.

See comment and recommendation under
Regulation 12, Page 43 and cover document.

REGULATION 23 (a)

Footnote 46/

This proposal is entirely logical and
has our support.

REGULATION 24 (2)

Reference should be to Regulation 23 not 25.

REGULATION 25

Footnote 4B/

Whilst OCIMF supports the principle behind
Regulation 25 further investigations need
to be completed and reviewed before it will
be possible to comment on this Regulation.
We would doubt the wisdom of including the
present text without further review and
probable amendment.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

Footnote 52/

REGULATION 26/

OCIMF COMMENT

We would consider such a regulation unnecessary.

It is our submission that this Regulation requires further detailed study. The last-minute inclusion of this item has not permitted detailed examination of the many problems which would be raised by its inclusion in its present form.

It would be our recommendation therefore that the present draft of Regulation 26 be deleted from the convention and the subject given further consideration with a view to its inclusion as a subsequent addition to Annex I or as a New Annex to the 1973 Convention.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

APPENDIX I TO ANNEX I

LIST OF OILS TO WHICH ANNEX I OF
THE PRESENT CONVENTION APPLIES

Delete the list of oils in Appendix I and substitute
the following:

See comment on Footnote 14/.

Oils in Category 1

Crude Oil

Reconstituted Crude
Topped Crude

Marine Diesel Oils (having less than 50% distilled
at 340°C by ASTM Method D86/67)

Blended Marine Diesel Oil

Residual Fuel Oils

ASTM No. 4 Fuel
ASTM No. 5 Fuel
ASTM No. 6 Fuel
Bunker C

Asphalts/Bitumen

Coatings
Road Oils
Cutback Bitumen

Lubricating Oils

Automotive
Aviation
Transformer Oils

Lubricating Oil Blend Stocks

Bright Stocks
Lubricating Oil Distillates
Solvent Neutral Oils

Intermediate Process Stocks

Cat. Cracker Feedstock

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATION

OCIMF COMMENT

Oils in Category II

Natural Gas Liquids

Liquified Petroleum Gases

Gasoline

Automotive

Aviation

Marine

Jet Fuels

JP 1

JP 3

JP 4

JP 5

Jet A1

Kerosines

Paraffin

Domestic Oil

Tractor Vaporising Oil

Stove Oil

ASTM No. 1 Fuel

Distillates

Gas Oils

Automotive Diesel

Heating Oils

Marine Gas Oils

Distillate Diesels (having more than 50% distilled at
340°C by ASTM Method D86/67)

Intermediate and Process Stocks

Gasoline Blending Stocks

Naphthas

Cracked Stocks

Alkylates - Fuel

Polymers - Fuel

Reformates

Petroleum Solvents

White Spirit (PVM Naphtha)

Mineral Spray Oils

Insecticide Spray Bases

APPENDIX I TO ANNEX I

OCDMP CONTENT

O I L R E C O R D B O O K

FORM OF OIL RECORD BOOK FOR OIL TANKERS

The basic content of the attachment is that which appears in the IMCO Assembly Resolution A.175(VI). However certain additions and modifications have been included and the reasons for them are listed hereunder.

1. Sectional Signature Requirements.

Whereas the requirement that signatures of the Officer in charge of the operation and the Master together with the date of entry at the end of each sub-section may appear onerous, there are nevertheless practical considerations which indicate that their inclusion is necessary against a single set of signatures at the end of a complete cycle (items 1 through 54).

In explanation Items 1 through 54 will inevitably cover a period of time the duration of which in turn will depend upon the voyage or trade of the vessel. On many vessels a time period in excess of two months may be involved between the entry in Item 1 and the subsequent entry in Item 54.

It is common practice amongst many Companies nowadays to relieve Masters and Chief Mates at the first port following completion of their stipulated sea service period.

This means that on many occasions more than one Master and one Chief Mate may be involved in a cycle of operations (1-54), and it does not seem reasonable that one man should sign as to the authenticity of entries completed at an earlier stage by another - as the Form as laid down in Resolution A.175(VI) presently requires him so to do.

1.1 As to the date whereas ideally each part of each Sub-Section should be completed as the operation called for is completed, in practice it is more reasonable to suppose that each Sub-Section will be completed as soon as the Sub-Section operation is completed.

This seems to be an essential requirement if the entries are in any way to reflect accurately that which took place rather than that which was later thought to have taken place.

The date of entry under each Sub-Section is seen to reinforce the necessity for early completion after the event and when accuracy is still ensured.

2. User Instructions

It would seem to be desirable that the Record Book should contain on the fly leaf certain instructions, in practical language, regarding the completion of entries.

Such instructions should stress:

- a) the importance of completing the required entries as soon after the event as is practicable
- b) that the entries should deal with matters of fact only

- c) that in making an entry the person concerned should at a future date and if called upon to do so, be able to speak in corroboration of the entry in question
- d) that entries made should be regarded as being the vessel's defence against allegations of contravention of the requirements
- e) that the Oil Record Book should be treated in the same manner as the Official Log Book and any corrections to entries should be erased by a single line through the previous entry and initialled by the person making the correction
- f) all entries should be made in ink or ballpoint pen.

2.1 Since it may be uncertain as to whether a vessel will be provided with a copy of the Convention or the Flag State's Legislation, it would seem sensible that the "basic" requirements of the Convention are also included in the Instructions as they affect tankers together with the definition of "Nearest Land".

2.2 The Instructions at the end of the form are self-explanatory. However some explanation for the need of an original and tear out duplicate and triplicate carbon copies may be necessary.

The concept of the triplicate copy which may be removed by a Flag or other State Administration Official is to ensure that any copy removed from a vessel truly represents the entries on the original. This is seen to be a matter of some importance in the Master's defence in the event of proceedings against the vessel.

The concept of the duplicate copy being forwarded to the Owner is to involve him in the proper operation of pollution abatement requirements and in house monitoring of vessel pollution abatement practices.

3. Entry Comments

3.1 Items 10-11

The addition of the word "cargo" clearly indicates that segregated ballast tanks are not being considered.

Again Items 10-11 have been altered slightly to reflect the fact that tankers in a number of instances take at the discharge berth ballast sufficient only to allow them to leave the berth and sail. Clear of port they then ballast down to sea passage requirements.

Clearly this involves two separate instances when sea valves are opened and it is felt these should be recorded.

Item 10 therefore deals with the initial departure ballast and Item 11 covers the taking on of the remainder of the ballast whilst Item 11a identifies the tanks in the second operation.

3.2 Item 27, 32.

It is not at all certain as to whether the term "interface" is so common as to be commonly understood without some reference to the fact that it refers to the interface between the oil or oily mixture and the settled water.

Inclusion of "oil residue" is aimed at clarifying this.

3.2 Item 35

The inclusion of "incoming" is further clarification.

3.3 Items 37/45

This is a new content Section covering disposal of clean ballast not contained in the IMCO format.

3.4 Item 53

Inclusion of the word "discharged" clarifies that it is oil lost to the sea which is being talked about in this Item.

3.5 Item 54

There is a tendency to overlook sometimes that the knowledge of those exclusively dealing with oil pollution matters is common knowledge. That which is judged by a seaman under the stress of an incident may not in fact be what an Administration Official requires to know remote from the incident.

The additions to this item are aimed therefore at conditioning the thoughts of a person making the entry towards recording the type of information sought.

DRAFT CONVENTION REFERENCE AND OCIMF RECOMMENDATIONS

APPENDIX III TO ANNEX I

Delete Form of Oil Record Book for Tankers and substitute the following:

**OIL RECORD BOOK
TANKERS**

Name of ship

Total cargo carrying capacity of ship in cubic metres

(a) Loading of oil cargo

1. Date and place of loading			
2. Types of oil loaded			
3. Identity of tank(s) loaded			

Date of entry Signature of Officer in charge of operation

(b) Transfer of oil cargo during voyage

..... Signature of Master

4. Date of transfer			
5. Identity of tank(s)	i From		
	ii To		
6. Was (were) tank(s) in 5(i) emptied?			

Date of entry Signature of Officer in charge of operation

(c) Discharge of oil cargo

..... Signature of Master

7. Date and place of discharge			
8. Identity of tank(s) discharged			
9. Was (were) tank(s) emptied?			

Date of entry Signature of Officer in charge of operation

(d) Ballasting of cargo tanks

..... Signature of Master

10. Identity of cargo tank(s) following discharge			
11. Date and position of ship at start of ballasting additional cargo tanks			
11a Identity of cargo tanks ballasted			

Date of entry Signature of Officer in charge of operation

..... Signature of Master

(e) Cleaning of cargo tanks

12. Identity of tank(s) cleaned			
13. Dates and duration of cleaning			
14. Methods of cleaning*			

Date of entry Signature of Officer in charge of operation

(1) Discharge of dirty ballast Signature of Master

15. Identity of tank(s)			
16. Date and position of ship at start of discharge to sea			
17. Date and position of ship at finish of discharge to sea			
18. Ship's speed(s) and true course during discharge			
19. Quantity discharged to sea			
20. Quantity polluted water transferred to slop tank(s)			
Identity slop tank(s)			
21. Date and port of discharge into shore reception facilities (if applicable)			

Date of entry Signature of Officer in charge of operation
 Signature of Master

* Hand hosing, machine washing (portable or fixed) or chemically cleaned, the chemical concerned and the amount used should be stated.

(g) Discharge of water from slop tank(s)

22.	Identity of slop tank(s)			
23.	Time of settling from last entry of residues, or			
24.	Time of settling from last discharge			
25.	Date, time and position of ship at start of discharge			
26.	Sounding of total contents at start of discharge			
27.	Sounding of Oil residue interface at start of discharge			
28.	Bulk Quantity discharged and rate of discharge			
29.	Final quantity discharged and rate of discharge			
30.	Date, time and position of ship at end of discharge			
31.	Ship's speed(s) and true courses during discharge			
32.	Sounding of oil residue interface at end of discharge			

Date of entry Signature of Officer in charge of operation

 (h) Disposal of residues Signature of Master

33.	Identity of tank(s)			
34.	Quantity disposed from each tank			
35.	Method of disposal of residues: (a) Reception facilities (b) Mixed with incoming cargo (c) Transferred to another (other) tank(s) (identity tank(s)) (d) Other method			
36.	Date and port of disposal of residue			

Date of entry Signature of Officer in charge of operation

 Signature of Master

(i) Disposal of clean ballast contained in cargo tanks

37.	Date and position of vessel at commencement of discharge of clean ballast			
38.	Identity of tank(s) discharged			
39.	Was (were) the tank(s) empty on completion			
40.	Position of vessel on completion			
41.	Date and port of final discharge of clean ballast			
42.	Identity of tank(s) discharged			
43.	Was any part of the discharge conducted during darkness, if so, for how long			
44.	Was a regular overboard check kept on the state of the sea in the locality of the discharge			
45.	Was any oil observed on the sea near the discharge during the operation			

Date of entry Signature of Officer in charge of operation
 Signature of Master

(j) Discharge overboard of bilge water containing oil which has accumulated in machinery spaces (including pump rooms) whilst in port*

46.	Port			
47.	Duration of stay			
48.	Quantity disposed			
49.	Date and place of disposal			
50.	Method of disposal (state whether a separator was used)			

Date of entry Signature of Officer in charge of operation
 Signature of Master

* The routine discharge at sea of bilge water containing any oil from machinery spaces including pump room bilges need not be entered in the oil record book but, if not, it must be entered in the appropriate log book, stating whether or not the discharge was made through a separator. Where the pump starts automatically and discharges through a separator at all times it will be sufficient to enter each day "Automatic discharge from bilges through separator".

(k) Accidental or other exceptional discharges of oil

51.	Date and time of occurrence			
52.	Place or position of ship at time of occurrence			
53.	Approximate quantity and type of oil discharged			
54.	Circumstances of discharge or escape and general remarks (i.e. direction of oil movement away from vessel, wind, tide etc.)			

Date of entry

.....

Signature of Officer in charge of operation concerned

.....

Signature of Master

INSTRUCTIONS

The Original of this Form is to remain on board for a period of two years from the last date of entry.

The Duplicate Copy should be detached on completion of a cycle (items 1-54) and forwarded to the Owner.

The Triplicate Copy may be detached by an Official of the Administration of the Flag State or other Signatory Government who is authorized under the Convention to make copies of entries in the Oil Record Book.

In this case the Master must obtain the signature of the Official concerned in the space below.

DATE

PORT

SIGNATURE OF OFFICIAL

TITLE, POSITION

STATE

