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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, 1973

#### Comments and proposals on a draft text of the Convention

Submitted by the Government of Argentina

#### ANNEX I

#### REGULATIONS FOR THE PREVENTION OF POLLUTION BY OIL

##### Chapter I

##### General

##### Regulation 1

##### Paragraph 1, footnote 1(1)

Vegetable oil and animal fat are not recommended for inclusion in the definition of "oil".

##### Paragraph 5(a), footnote 2

It is recommended not to approve footnote 2.

##### Paragraph 5(b), footnote 3

A period of five years is suggested.

Paragraph 7(1), footnote 4

It is recommended to approve addition of text as written in this footnote.

Paragraph 8, footnote 5

We oppose the suggestions made in this footnote.

Paragraph 8, footnote 6

Delete the words between square brackets.

Paragraph 9, footnote 7

Delete the reference to the 1958 Geneva Convention as recommended by this footnote.

Paragraph 10

It is recommended not to consider "special areas", as the Convention should ensure uniform worldwide regulations.

Paragraph 18, footnote 8

This footnote is not approved.

Regulation 2

Paragraph 2

It is recommended not to make reference to Regulation 26, due to reasons given when considering this regulation.

Regulation 4

Paragraph 1(c), footnote 11

An extension of the term of periodical inspection to six months should be granted.

Regulation 9

Paragraph 1, footnotes 15 and 16

Text of these footnotes should not be adopted.

Paragraph 1(11)

Delete this paragraph in accordance with suggestion made under Regulation 12.

Paragraph 1(a)(v)

The following text is recommended: "the total amount of oil discharged overboard allowed only during ballast voyages (performed after the unloading of the cargo) should not exceed ..."

Paragraph 1(a)(v)(1) and (2), footnotes 18 and 19

Text of these footnotes should not be adopted.

Paragraph 1(b)(iv), footnote 20

We recommend not to approve text of this footnote.

Paragraph 1(b)(v)

Delete this paragraph in accordance with suggestions made in Regulation 12.

Paragraph 1(b)(vi)

The following text is recommended: "The ship has in operation an oily water separating equipment or other similar installation as required by Regulation 16 of this Annex".

Paragraph 2

Delete this paragraph for reasons given under Regulation 12.

Paragraph 3, footnote 21

Alternative (iii) is recommended but that evidence should be proved by the accusing authority and not by the accused ship.

Regulation 11

Paragraph 2, footnote 25

This footnote is not approved.

Paragraph 3

It is recommended that the bracketed number of the last sentence should be changed to three years.

Regulation 12

Paragraph 1

As mentioned under Regulation 1, paragraph 10, we do not approve the existence of special areas in order to ensure regulations of a universal character.

Paragraph 1(b), footnote 27

We are not in accordance with this footnote.

Paragraph 2, footnote 28

If special areas are finally approved, we recommend the suggestions made under this footnote so that only one set of rules is approved for all special areas.

Paragraph 2(c), footnote 29

The adoption of this footnote is recommended.

Regulation 13Paragraph 2, footnote 33

A strong opposition is made to the suggestions of this footnote.

Paragraph 3

Delete the existing text and 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:

$$d_m = 1.8 + 0.018L$$

in which:

$d_m$  = mean draft in metres

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

Paragraph 3 and 3(b), footnotes 34 and 35

These footnotes are accepted if the formula proposed under paragraph 3 above is not accepted.

Regulation 15Paragraph 3(b)

Delete the last sentence because if technique develops enough there should not be need for large tankers to use two slop tanks instead of one.

Paragraph 3(d)

Delete the word "automatic". Monitors and monitoring systems are expensive and beside they have not been technically developed nor proved to be effective as to be incorporated in this Convention.

Paragraph 3(f)

This manual should be issued by IMCO or ICS, as it was done in other similar cases.

Regulation 17

Footnote 41

Not approved. It is considered that there is no relationship between the horsepower of the propelling machinery and the amount of sludge to be disposed of.

Regulation 18

Paragraph 1

Delete the word "and", for clarification purposes.

Paragraph 2

Delete this paragraph. If not, it should be referred to the "normal waterline" and not to the phrase "above the waterline in the heaviest ballast condition", which is considered ambiguous.

Paragraph 3

Delete this paragraph.

Paragraph 3, footnote 42

If paragraph 3 is not deleted, this footnote should apply only to new ships. On the other hand it is necessary to remark that if monitoring control of the unloading is approved, there are no reasons to keep the visual control of it. Neither can the latter be carried out at night.

Regulation 19

The standard shore connection should be obligatory only for conventional ships and not for oil tankers once they are provided with a great variety of special flanges and hose systems which do not require a flange of the type proposed in this regulation.

Regulation 20

We doubt about the feasibility of this rule in those countries which, being oil exporters but not having a merchant marine, will not be interested in affording shore installations. Therefore reasonable terms for the construction of these should be granted.

Regulation 21Paragraph 2

Delete obligations of points (iii) and (v). Add to subparagraph (iv) "a lightering to other ships". Remove brackets from subparagraph (x) and clarify meaning of the word "disposal". We are not in accordance with footnote 44. We agree with footnote 45, second sentence, but not with first sentence.

Regulation 26

Stationary ships should not be included in an international convention because they normally belong to a special country and will be anchored in its jurisdictional waters. If fixed platforms are included in this definition, it is evident that they will also be subject to national regulations though they belong to another country.

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