



## 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 Egypt

#### Articles

##### Article (2)

Replace text of paragraph (2) by the following:

- (2) "Administration" means the government of the State in which the ship is registered or unregistered but having its nationality.

##### Article (3)

Replace text of sub-paragraphs (1)(a) and (1)(b) by the following:

- (a) ships registered in one of the contracting States  
(b) unregistered ships but having the nationality of the contracting State.

#### Annex I

##### Regulation (12)

Sub-paragraph (1)(a): Delete the word "and" between the two words "Baltic Sea" and "Black Sea", then add the following at end of the sentence:

"Red Sea and Arabian Gulf"

Paragraph (2):

The title to be read as follows:

"The Mediterranean Sea, Red Sea and Arabian Gulf."

Add after the words "in the Mediterranean Sea" in the first line of the first sentence, the first line of sub-paragraph (2)(a), and in the fourth and ninth lines of sub-paragraph (2)(b), the following words: -

"Red Sea and Arabian Gulf"

Add between the words "Mediterranean" and "Ports" in the eleventh line of sub-paragraph (2)(b) the following words: -

"Red Sea and Arabian Gulf"

Annex II

Regulation (3): Three categories are recognized, namely, "A, B and C" for the segregation of noxious liquid substances i.e. those requiring prevention from escape to the sea (A); those only requiring special antipollution measures prior to their release (B); or those with minor pollution aspects and therefore requiring special operational conditions (C).

In all cases, our comments have special emphasis on the following parameters set up for such categorization or division:

- Hazards to marine resources.
- Hazards to human health.
- Harm to amenities and for legitimate uses of the sea.

1. Though we would go along with such parameters in general, they would seem rather limited in the pollution sense and therefore would need further extension or elucidation to cover the requisites of natural self-purification processes and their possible interference with such agencies in one way or another. It would also be desirable to elucidate the question of their effects on marine resources, which should be defined as toxicity to fish, and toxicity to other aquatic life including tainting in all cases. Accordingly, the scope of the suggested parameters might collectively cover the following:

- A. Interference with aerobic biological processes.
- B. Interference with anaerobic biological processes.
- C. Toxicity to fish including tainting and accumulation.

- D. Toxicity to other aquatic life including tainting and accumulation.
- E. Direct and cumulative hazards on humans including amenities.

Such a spectrum would in turn need a redefinition of noxious liquid chemicals in accordance with a finer adjustment to resolve the effects of casual and continuous release of noxious liquid chemicals close to territorial waters at depths over 25 metres (i.e. within the limits of most coastal-shelf waters). In entertaining this view, the Egyptian Government would request a more precise definition for each chemical substance liable to be carried in a liquid form and therefore would require tank washing following its carriage. A formula denoting the status of the chemical substance in question would specify its outreaching effects on the marine environment (from A to D) or on the human factor as the ultimate beneficial user of the marine environment (E).

2. In turning to Appendix I another totally different parameter has been suggested for classification based on the " $TL_m$ " values. Besides being a very limited parameter, originally based on laboratory evaluation and hard to determine or control outside the laboratory, it is reputed for toxic or median tolerance levels (50% fish kill rates) by a given substance thus denoting to one angle of the pollution picture. It may be well reputed as a suggestive parameter for human hazards, since fish are more sensitive creatures and of a smaller size than men and they also have a wider exposure liability to toxic effects in their environment than man. Other interferences are liable to occur from a given chemical with regard to aerobic and anaerobic biological processes, as well as damage to aquatic life other than fish. All of these have been overlooked when relying on the " $TL_m$ ", criterion. It may be worthy to stress the fact that serious pollution may arise from continuous discharge of chemical washings which interfere with natural pheromones and atmospheric oxygen saturation levels in sea water, or interfere with bacterial activities responsible for biological degradation processes.

3. In reviewing the list of noxious substances recorded in Appendix II, certain alterations are suggested on the basis of actual toxicity or tolerable limits acceptable in water. Furthermore, a few additional substances are suggested (see table 1).

4. In studying the list of liquid substances carried in bulk and which supposedly can be regarded as presenting negligible or no harm as pollutants (Appendix III), some 28 chemicals were found to cause fish toxicity and according to the "TL<sub>m</sub>" parameter these should be shifted to Appendix II. The listing of such chemicals is herewith attached (Table 2).

Table 1

Substance	UN number	Pollution	category	Residual conc.
	I	II	change to:	III
Acrylic acid	-	(C)	B	
Alkyl benzene sulphonate:				
a. straight chain	-	C	A	
b. branched chain		B	A	
Benzene (benzole)	1114	C	A	
* Benzyl bromide	-	C	A	
* Butyl acrylate			(B)	
Carbon tetrachloride	1846	B	A	
* Dichlorobutane	-	-	A	
Formaldehyde				
(37-50% solution)	1198	C	B	
Hydrofluoric acid				
(40% aqueous)	1790	B	A	
Hydrogen peroxide				
(greater than 60%)	2015	C	B	
Phenol	1671	B	A	
* Surfactants	-	-	B	
Toluene diisocyanate	2078	(B)	A	

\* to be added.

Table 2

Chemicals known to cause fish toxicity

Acetone  
Acetonitrile  
Adiponitrile  
Alum 15%  
Sec-Butyl acetate  
iso-butyl acrylate  
N-Butyl acrylate  
chlorohydrins  
Diethanolamine  
Diethylene glycol  
Ethyl acetate  
Ethyl alcohol  
Ethylene glycol  
Formic acid  
Glycerine  
n-heptane  
n-hexane  
Hydrochloric acid  
Lactic acid  
Methyl alcohol  
Methyl methacrylate  
iso-octane  
Olive oil  
Oxalic acid  
Propionic acid  
Propionic anhydride  
n-Propyl alcohol  
Titanium tetrachloride

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