



IMCO

INTERNATIONAL CONFERENCE ON
MARINE POLLUTION, 1973
Committee II
Agenda item 2

CONSIDERATION OF THE DRAFT TEXT OF ANNEX I OF THE INTERNATIONAL CONVENTION FOR THE PREVENTION OF POLLUTION FROM SHIPS, 1973

Comments and proposals on Regulations of Annex I

Submitted by the Government of the United Kingdom

Further to MP/CONF/8/16/Add.1, comments by the United Kingdom on Annex I are submitted as follows:

Regulation 8

The United Kingdom agree with the Netherlands and OCIMF that the extensions both to the survey period and the duration of Certificate should be dealt with as in Regulation 14 of Chapter I, Part B of SOLAS 1960. At the moment there is no provision in the draft document to allow an extension to the Certificate without survey, as there is in SOLAS 1960, and it is considered that it is necessary to provide a period of one month extension of certificate or for a period not exceeding five months to permit a vessel to proceed to its country of registry or place of survey as permitted in the 1960 Safety Convention.

Regulation 8(2) is rather restrictive as drafted and it is proposed to add the word "significant" before "alterations" in the penultimate line.

Regulation 15

It appears from the number and variety of comments on this Regulation that considerable discussion will arise when the Committee deals with this Regulation, as the decanting of effluent within the clean ballast criteria is perhaps not adequately covered.

In the hope of limiting the discussion, the United Kingdom have attempted a redraft of this Regulation, taking certain proposals into account and propose it for consideration:

"Regulation 15Retention of Oil on Board Oil Tankers

(1) As draft.

(2) As draft, but add "decanting and" in the second line. It would then read:

"The ship shall be provided with adequate means for cleaning cargo tanks and with means for decanting and for ... etc."

Add Sub-paragraph (2) bis as follows:

"The ship shall be provided with means to ensure that any effluent decanted to the sea from tanks carrying dirty ballast shall be within the criteria established for 'clean ballast' under Regulation 1."

(3)(a) Reword as follows:

"Arrangements shall be provided to transfer the oily residues into a slop tank or combination of slop tanks and to deal with these therein in such a way that any subsequent effluent discharged to the sea will be within the limits of oil content imposed on clean ballast under Regulation 9 of this Annex."

(3)(b) It is necessary to cover for the need by some existing tankers to be allowed to use cargo tank as a designated slop tank under the definition in Regulation 1. This could be implemented by rewording the final sentence of (3)(b) as:

"New oil tankers [over 100,000 tons deadweight] shall be provided with at least two slop tanks."

(3)(c) As draft.

(3)(d) As proposed in MP/CONF/8/16/Add.1, the United Kingdom suggests this sub-paragraph should start with:

"The tanker should be fitted with an instrument, approved by the Administration, which continuously monitors the oil content of any effluent discharged to the sea ... etc."

(3)(e) The United Kingdom would support the re-draft proposed by Canada in MP/CONF/8/Add.1.

(3)(f) As draft."

Regulation 16(1)

This requires ships other than oil tankers over [10,000] tons gross tonnage to fit an oil discharge monitoring system. Regulation 16(2) requires smaller ships to fit a separating or filtering system complying with the provisions of paragraph (4) of that Regulation, i.e. it shall provide an effluent below 100 ppm. At present oil monitoring systems in the United Kingdom though considered to be effective in dealing with crude oils, have to cover too wide a band when dealing with mixtures which can be found in machinery space bilges, although further developments may result in accurate and effective instruments.

Meantime it will be necessary to provide some flexibility to allow development to proceed in other directions in an attempt to provide a system which cannot result in effluent having an excessive oil content.

It appears that an alternative to the monitoring system could be a combination of an effective separator, to reduce the oily water mixture to below 100 ppm in open waters, together with an effective filtering system which would reduce this to the equivalent of clean ballast. Such filters are being developed and show some promise.

The United Kingdom therefore would propose a redraft of Regulation 16(1) as follows:

"Any ship of [10,000] tons gross tonnage and upwards shall be fitted:

- (a) with an oil discharge monitoring system to comply with paragraph (5) of this Regulation, or
- (b) with an oily water separating system complying with paragraph (5) of this Regulation and an effective filtering system which can accept the effluent from the separator and will produce effluent which meets the standards of clean ballast as defined in Regulation 1."

Regulation 18(3)

The United Kingdom considers that the present wording of this sub-paragraph is not adequate, and that the comments of various countries confirm this. The United Kingdom would propose a rewording as follows:

"In new oil tankers, remote stopping devices for the pumps discharging overboard through the piping referred to in paragraphs (1) and (2) of this Regulation shall be provided at a position where the effluent is under visual supervision."

Regulation 21(2)

The United Kingdom would agree with the Soviet intention made in MP/CONF/8/8 and considers that Sub-paragraphs (a)(iii) and (a)(v) could be combined and would propose the following wording:

"Closing/opening of isolating valves between cargo piping and ballast (sea-water) piping, and of the ships' side valves when the vessel is alongside terminals."
