



IMCO

INTERNATIONAL CONFERENCE ON
MARINE POLLUTION, 1973
Committee III
Agenda item 3

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

Proposed Amendment to Regulation 6 of Annex II

Submitted by the United States of America

The United States of America feels that platforms should not fall within the purview of Annex II when in their designated operational mode.

As opposed to a ship, such platforms are not capable of performing any operational function while underway. Therefore the various regulations of this Annex are not applicable.

The Ad Hoc Panel of IMCO and GESAMP experts in their report MP/CONF/INF.5 undertook "to develop a rationale to evaluate substances which are carried as a bulk liquid product or dry cargo or a packaged cargo". The panel assumed that "the discharge would be made with a vessel, underway and offshore".

Because there are significant operational differences between ships and platforms, an entirely different approach for controlling discharges from fixed platforms may be required.

At the present time certain technology is available to facilitate control of discharges from fixed sources, e.g. diffuser heads at the ends of discharge pipes, advanced treatment of wastes prior to discharge, recycle methods, and judicious use of the natural dispersion mechanisms of the surrounding sea.

At least the following factors should be considered when developing discharge requirements for fixed platforms:

- (1) the types, volumes, and rates of discharge of materials from fixed platforms, given the stationary nature of such structures;
- (2) the proximity of fixed platforms to transport facilities ashore;
- (3) depth of water at a fixed location and prevailing tides, winds, and currents which will affect a discharge from a stationary structure at that location.

The United States of America proposes that a resolution be drafted by the Conference requesting the Organization to undertake a study of the problems associated with discharges from fixed platforms and to establish procedures and arrangements which are applicable to the control of such discharges.

Pending the outcome of this study and the publication of standards by the Organization, the United States of America proposes the addition of the following paragraph (d) to Regulation 6 which will except fixed platforms from the provisions of Annex II:

- (d) fixed platforms.
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