



To the International Commission on Shipping
By e-mail

Oslo 8th December 2000

Dear Sirs,

Thank you very much for coming to our office last month.

As encouraged by you, we take this opportunity to submit further comments to some of the points that we discussed.

1. INTERTANKO's objectives

At Appendix 1, please find an overview of INTERTANKO's aims and a short background to the Association.

Full membership of INTERTANKO is available to independent tanker owners (non- oil company and non-state owned). They have to have all their tankers classed with an IACS member, have good standing with a P&I Club and adequate oil pollution coverage, as well as being ISM Code certified. Repeated detentions may have an impact on continued membership, please see item 7 below.

We are at the moment discussing other criteria to further promote INTERTANKO's main objectives of Safe Transport, Cleaner Seas and Free Competition.

2. Mission Statement

Please find our Mission Statement at Appendix II

3. Ports of Refuge

We underlined the importance of having plans for Ports or Anchorages of Refuge. Our thinking can be seen in the enclosed short (Appendix III) paper which we submitted to the European Commission.

4. The primacy of IMO

We emphasised the need for international as opposed to regional or national regulation of shipping, which is very much an international industry. INTERTANKO's very strong views on this issue can perhaps be best illustrated through the litigation we started against the State of Washington. An extremely brief overview of the latter can be found at Appendix IV.

5. Classification Societies

Please find attached a joint INTERTANKO/OCIMF paper outlining our combined views. (Appendix V).

6. Port State Detentions

The Association's views on Port State Detentions are summarised in Appendix VI

7. Chemical carriers

Please find attached a summary of INTERTANKO's views regarding further promotion of safety for Chemical carriers. (Appendix VII)

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Please do not hesitate to contact us should you desire further clarification.

Kind regards

Kristian R. Fuglesang

Appendix I, objectives

INTERTANKO is strongly committed to providing leadership in **safe transport, cleaner seas and free competition**

The International Association of Independent Tanker Owners (INTERTANKO), which was established in 1970, represents the interests of independent tanker owners around the world, and full membership is available to all non-oil company and non-state-controlled tanker owners. Companies with a commercial interest in tanker operations and related activities may become associate members.

Safe Transport

In an industry where the number of tanker accidents and oil spills are continuously declining and where maritime disasters are often the catalysts of change, INTERTANKO members have committed to building, properly maintaining and operating quality ships having in mind the safe and environmentally sound transport of oil. Today, 99.996 per cent of the world oil carried by sea reaches its destination safely and without incident.

Highlighting their commitment, INTERTANKO members adopted a Mission Statement in 1997 establishing a set of minimum criteria as a requirement for membership and declaring their willingness to expel members showing signs of non-compliance.

Recognizing that maritime safety is dependent on the proper function of a series of links working closely together and representing all the parties involved in the carriage of oil by the sea, INTERTANKO adopted the Responsibility Chain concept. INTERTANKO has invited classification societies, charterers, cargo owners, shipyards, port authorities, port agents, pilots, terminals, and the salvage industry to commit themselves equally and bear their fair share of the responsibility for safe tanker shipping.

As shipping is a global business in which the vast majority of nations participate, INTERTANKO promotes the interests of the tanker industry vis-a-vis governments, intergovernmental organizations and the International Maritime Organization (IMO) - the specialised UN marine safety agency, which is the optimum forum for developing uniform, harmonised codes, guidelines and regulations governing ship safety and pollution prevention.

High on the agenda on INTERTANKO's work programme are issues such as the promotion of uniform international regulations; navigational and pilotage matters; the improvement of vessel traffic separation and control systems; waterways management, hydrographic mapping; operations and improvement of ports and port operation; raising the standards of terminals; provision of ports of refuge; the fight against piracy; and the fight against criminal liability being imposed on ships' Masters, officers, crew and company officials

INTERTANKO strives for greater transparency in tanker shipping through a dialogue with charterers and regulators aimed at achieving effective regulation and enforcement.

INTERTANKO has a great respect for the work of the classification societies and aims to enhance the safety of technical and operational issues. INTERTANKO works for higher standards of class regulations and their implementation, standards for newbuildings, class inspections and reporting, and promotes unified implementation of class/IACS Unified Regulations. Great consideration is given to the continuous improvement of the Enhanced Survey Programme, the protection of bunker tanks for newbuildings, corrosion prevention and onboard guidelines for oil cargo operations. INTERTANKO also promotes class involvement in the investigation of accidents and supports expanded liability for class in cases of proven negligence or gross negligence.

Supporting the important work of Port State Control (PSC) authorities as the most effective means to remove less scrupulous operators, INTERTANKO has promoted effective improvements in the Port State Control (PSC) system and seeks preferential treatment for quality tonnage by the PSC authorities.

Cleaner Seas

The environmental challenge has been high on INTERTANKO's agenda from its inception. Being sensitive and understanding to the increasing intolerance of public opinion with regard to oil pollution, INTERTANKO will continue to play its part in the important area of marine pollution prevention. Responding to the right of the public to know, tremendous efforts have been made in establishing and enhancing a continuous dialogue with the public, the press and our industry partners.

INTERTANKO's focus on environmental issues is maintained through continued engagement with regard to ballast water management, international rules on the recycling of ships, TBT, air pollution, measures to reduce the effects of accidents, promotion of guidelines for vessel response plans for chemical tankers, the categorization and carriage of oil cargoes, the promotion of tagging of ship cargoes and bunkers when appropriate technologies and safeguards against misuse are in place.

By surveying particular trades or geographical areas INTERTANKO has highlighted the lack of port reception facilities, questionable operations practices and standards of ports and terminals.

INTERTANKO works to promote further reductions in the operational discharge of oil. The work to arrive at an accurate international assessment of discharges of oil into the seas is highly prioritised by INTERTANKO, while the Association will continue to promote Segregated Ballast Tank (SBT) requirements for vessels below 20,000 dwt and lobby for reductions in port costs for SBT tankers.

Charterparty clauses providing for arrival in clean ballast, all weather performance clauses and clauses that further erode the risk sharing in maritime transportation ventures will be continually opposed by INTERTANKO as they do not provide an incentive for environmental protection.

Free Competition

INTERTANKO's membership comprises some 260 Members operating 2057 tankers, amounting to 161,8 mil dwt, and representing some 70% of the independent tanker fleet over 10,000 dwt. With the aim of promoting a free and competitive tanker market, INTERTANKO has on many occasions campaigned against artificial restrictions on the opportunity to compete for business, supporting the free flow of information and market practices based on good ethics. The Association has produced a large number of well researched papers demonstrating that restrictions on the opportunity to compete will result in distortion of the market, inefficiencies, increased transportation costs and a waste of resources.

Promoting the use of Quality Tonnage
Setting Up the Quality Standards for the Tanker Industry
Attack Low Quality Operations
Achieving Higher Credibility for INTERTANKO Membership

Appendix II – Mission Statement

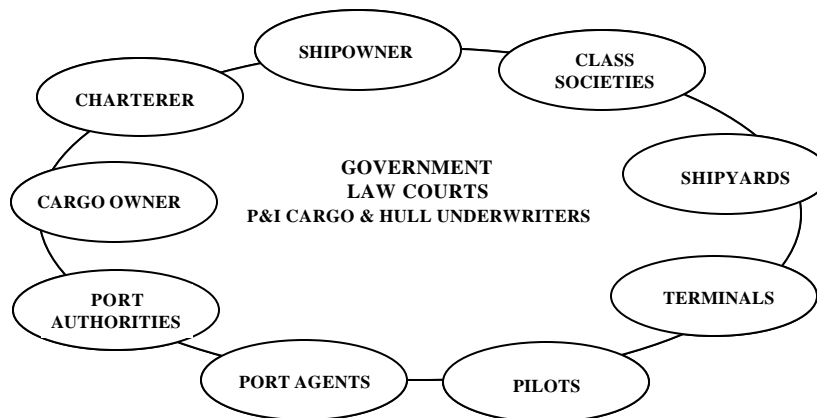
INTERTANKO is committed to working for safe transport, cleaner seas and free competition.

INTERTANKO is committed to strengthening the position of the Independent Tanker Owners in the tanker industry in particular and in society in general.

INTERTANKO will, where necessary to ensure marine safety and environmental protection, provide leadership in the development and implementation of technically sound, cost-effective regulations and industry standards. Given the global nature of the industry such regulations and industry standards must be applied uniformly and on an international basis.

INTERTANKO recognises that the responsibility for upholding the principles of safe transport, cleaner seas and free competition depends on many participants in the shipping industry who are closely linked together. INTERTANKO is committed to ensuring that the Independent Tanker Owners are a strong link in a Chain of Responsibility. INTERTANKO encourages the other links to maintain and develop similar high standards.

RESPONSIBILITY CHAIN



INTERTANKO will achieve its goals through active participation by its Members and by seeking support from and co-operation with Authorities, other shipping organisations, its Associate Members, the general public and other interests.

INTERTANKO members employ qualified people including seafarers whose dedication and professionalism are the foundation of safe vessel operation. Effective ISM Code compliance requires open communication and trust between the seafarers and the owner ashore.

Members of INTERTANKO will have:

1. A certified ISM system.
2. All tankers classified by a Classification Society audited and approved by IACS.
3. All tankers entered in a P&I Club.
4. Satisfactory oil pollution response plans and insurance cover.

INTERTANKO's vision is for a competitive tanker market in which Independent Tanker Owners provide, and charterers employ, safe vessels offering the maximum degree of marine and environmental protection to meet the world's demand for safe and efficient oil transportation.

PORTS AND ANCHORAGES OF REFUGE

1. One of the issues arising from the ERIKA case, and indeed from other shipping accidents, is how to handle ships which are in trouble. Individual ports may be reluctant to admit them because of the risk of pollution within the port and the subsequent disruption and loss of business. Yet to send the ships back out to sea could seriously increase the likelihood of an accident and the risk that pollution will be greater and spread over a wider geographical area and cause more environmental damage than might otherwise have been the case.
2. However far-reaching the changes that are made as a result of Erika, accidents cannot be ruled out completely and port and other national authorities will from time to time be faced with this acute dilemma. The dilemma might be made less acute if on any stretch of coast on the main shipping routes, there were designated ports or anchorages which would be available to a ship in trouble. These ports and anchorages would need to be selected on the basis that they would have adequate depth to safely accommodate damaged ships, as well as shelter from the prevailing winds and swells to facilitate the prompt and controlled transfer of cargo to another ship or to land-based storage. Suitable tugs and other resources should be available in the vicinity of the port or anchorage to facilitate the transfer operations. It would also be important to ensure that appropriate contingency plans and oil pollution combating equipment were in place to deal effectively with any small spills that may occur.
3. It is unlikely that market forces alone could achieve this. It would almost certainly be necessary for governments to designate the ports/anchorages. Equally, we do not underestimate the political difficulties involved in choosing a site; it may well be necessary for a government to indemnify in some way the authorities of the surrounding areas.
4. The idea is thus not without difficulty. Its overwhelming advantage is that it could make the difference between a major spill like that from the Erika and no spill at all.

5. The concept seems ideal for the EU. It would be directed towards the prevention of pollution rather than having a direct impact on the ships themselves and it would thus not be necessary to go through IMO. Although each Member State would have to be responsible for designating the safe havens within its territory, it makes sense to plan the network on an EU scale. It is, for example, conceivable that a single safe-haven could cover the coast line of a neighbouring country and an EU programme thus makes more sense than a series of national programmes.

6. An issue closely related to the issue of safe havens is that of the rights of ports to turn away ships in trouble. There may be in some cases good arguments for sending a ship out to sea (e.g. that any oil spilt would be more easily dispersed there). But given the risks to the life of the crew and the dangers of pollution to other parts of the coast, decisions to refuse to admit a ship should be taken by an authority which can take all factors into account and in the light of guidelines established by the E.U. These guidelines might indeed differ depending on whether a suitable safe haven existed.

7. One possible approach to working out these ideas might be for the Commission to put together a working group consisting of experts from Member State governments and the relevant shipping associations and institutions (for example INTERTANKO, ICS, ECSA, OCIMF, ITOPF, the IOPC Funds' Secretariat, P&I Clubs, Friends of the Earth International and WWF) to come up with proposals. These could then form the basis of Commission action or Commission proposals to the Council as appropriate. Proposals to the Council would be a natural follow-up to the proposed directive on accidental marine pollution; they would also be a relevant response to the resolution of the European Parliament on Erika.

Appendix IV

Quick overview of litigation against the State of Washington:

- Initiated in July 1995
- State of Washington imposed regulations on
 - *vessel design*
 - *construction*
 - *crew qualification*
 - *equipment*
 - *manning requirements*
- INTERTANKO stated "such actions by the State interfered with federal and international regulatory requirements governing tank vessels"

- Federal district court in Seattle
- Ninth Circuit Court of Appeals
- US Supreme Court :
 - constitutional challenge
 - unanimous decision on 6 March 2000:

*"the State of Washington has enacted legislation
in an area where the federal interest
has been manifest
since the beginning of our Republic
and is now well- established."*

- United States government plays a leadership role
- Support received from a number of international organisations and governments of maritime nations
- Rules for safety and operations of shipping should be strict and international enhancing vessels' safety and environmental protection.



OCIMF / INTERTANKO

AIDE MEMOIRE FOR MEMBERS WHEN MEETING WITH CLASSIFICATION SOCIETIES

OBJECTIVE : To bring about significant improvements in Classification Societies performance

OCIMF wishes to take the opportunity to address the following matters directly with Classification Societies because of the perceived weakness and lack of influence of IACS upon its membership and with a view to ensure consistency across the board in respect of critical areas.

Although still committed to support IACS, INTERTANKO joins OCIMF in these discussions in an attempt to use all means available for a rapid restoration of the authority and the credibility of the Class system. OCIMF and INTERTANKO have the following common views on how Classification Societies may achieve this goal.

PRELIMINARY COMMENTS:

In accordance with their mission, the co-authors have confined their comments in this document to the oil tankers segment although some of these may be found relevant to other sectors of the shipping industry.

The intentionally focused and specific nature of the comments below should not prevent industry parties undertaking a fundamental examination and review of the relationships between Classification Societies, Shipowners and Flag States in the context of their potentially conflicting objectives. OCIMF and INTERTANKO also believe that the relationships between Classification Societies, Shipyards, and Shipowners during construction needs fresh consideration.

This paper takes into account the proposals made in the document MEPC 45 / INF 22 submitted by IACS to the IMO Marine Environment Protection Committee, notably the third and fourth bullet point of its section 2 respectively dealing with the number of exclusive surveyors attending the special and intermediate survey and the measuring of steel thickness and the first bullet point of its section 3 dealing with transfer of class of ships subject to ESP above a certain age (as referred to below in the relevant section of this document).

1 LIABILITY

OCIMF and INTERTANKO strongly believe that, when acting on behalf of the shipowner, Classification Societies should also be liable to third parties in case of negligence or fault.

2 TRANSPARENCY

2.1 OCIMF and INTERTANKO requests that Classification Societies ensure that IACS establishes a database, freely accessible on the IACS web site, providing:

- Vessel particulars, full class status and reasons leading to all suspensions and withdrawals of Class.
- Vessel particulars and relevant class information (date of transfer, name of losing and gaining class societies etc) on all Transfers of Class.

In both cases, the information should be made available to IACS by the Societies on the same day of the decision and IACS should make it available on its web site within 48 hours.

2.2 OCIMF and INTERTANKO believe that a continuous synopsis record, from a vessel's launch to scrap, of changes of Class, Flag, ownership, and Company (as defined in the ISM code) should be retained and available on board. The Condition Evaluation Report (Survey Report file) may be the appropriate place to accommodate this information. OCIMF and INTERTANKO look to Classification Societies to promote this improvement through IMO.

2.3 Internal IACS Early Warnings System
Classification Societies should assist IACS to develop an internal process for operating a central IACS Early Warning System (EWS). This EWS should enable the identification of not only sister vessels, but also of vessels with similar structural arrangements, and with similar critical equipment and machinery. The design of the system should be such that it allows modification dictated by the experience of operating the EWS. Every member of IACS should contribute the necessary ship data for each vessel in its fleet. Every member of IACS should notify IACS of notable defects occurring on vessels of their fleets and warranting a possible early warning alert. Procedures for raising and for responding to EW alerts to be available to the IACS Quality Advisory Committee.

2.4 OCIMF and INTERTANKO are concerned that many of the IACS procedures are not freely accessible (e.g. Transfer of Class Agreement needs the unanimous approval of the IACS Council to be accessible to a third party). OCIMF and INTERTANKO believe that Classification Societies should ensure that all IACS procedures and requirements be freely accessible on the IACS web site to all who need to know.

3 INVESTIGATION BOARD:

- The ability to conduct independent post incident technical and procedural investigations to establish Class performance. OCIMF and INTERTANKO strongly believe that IACS has a duty to investigate technically notable accidents before making permanent rule changes. The number of significant tanker accidents is relatively small, which gives the opportunity for improvements based on thorough assessment of the root cause of such accidents. Class should, through IACS, establish an investigation board for accidents. The board should include independent members of the industry. The results of investigations should be made available to flag states.

4 CONTROL / AUDITING:

OCIMF and INTERTANKO believe that Classification Societies should review and re-define the role and Terms of Reference of the IACS Quality Advisory Committee (if it is to have any substantive meaning) to provide it with:

- 4.1 A more decisive role in Class activities. (The terms of reference for the Committee should be broadened to encompass the quality operation of Classification Societies rather than limited to the Quality Services Certification Scheme - QSCS).
- 4.2 The ability to initiate and to perform independent and unhindered auditing of procedures and decisions. (Today, the QSCS only does a document compliance audit. The Quality Advisory Committee should also control the application of quality procedures through an internal self-assessment system).

OCIMF and INTERTANKO believe that in order to complete a good industry control system:

- 4.3 Classification Societies should set up a "complaints procedure" between the industry and IACS. When members of the industry have a complaint against an IACS Society, there must be a more available and immediate IACS mechanisms to address the complaint, follow it up, and advise the outcome. The IACS Quality Advisory Committee to have access to the "complaints file".
- 4.4 Classification Societies should, individually but also through IACS, take initiative to enhance a common procedure for "self-policing action", preferably involving external independent assessors within the audit process. This procedure could be based on individual or collective experiences, internal IACS early warning system or on issues reported from ship operators, Port State Control, or "complaints procedure". This would also serve as a feedback mechanism to evaluate classification societies performances. This should also include vertical audits where more serious problems are encountered (see above).

5 IMPROVEMENTS TO TRANSFER OF CLASS AGREEMENT (TOCA)

OCIMF and INTERTANKO believe that as part of the TOCA procedure:

- 5.1 A Transfer of Class should only take place when the ship has been cleared by the losing society of any Condition of Class / Outstanding Recommendations relating to structure.
- 5.2 Copies of the losing Classification Society records (all documentation relevant to the condition of a ship, including survey history and historical documentation) should be passed on to the gaining Classification Society as early as possible when a Transfer of Class is initiated (losing society advised formally by the gaining society) and in any case before the transfer is concluded (this is not currently a standard practice).

This section takes into account the proposal made in the document MEPC 45 / INF 22 submitted by IACS to the IMO Marine Environment Protection Committee which reads as follows:

- *For ships subject to ESP, which are 15 years of age and above, the gaining society has to perform a full special hull survey or Intermediate survey whichever is due next. For all ships, which are 20 years of age and above, the gaining society has to perform a full Special hull survey. If a dry-docking of the vessel is not due at the time of transfer, consideration can be given to carrying out an underwater examination in lieu of dry-docking.*

This measure is announced to be implemented from the 1 July 2001.

6 UNIFIED REQUIREMENTS

- 6.1 OCIMF and INTERTANKO firmly believe that as IACS Unified Requirements (UR) are agreed, they must be applied **uniformly and consistently** and **without any reservation** by all IACS Members. This, with the proviso that the Unified Requirements are the minimum standards and that IACS members should be at liberty to apply a higher standard if they deem appropriate.
- 6.2 Consequently, OCIMF and INTERTANKO would like to see an IACS procedure for sanctioning Classification Societies which do not apply uniformly and without reservation the IACS Unified Requirements.
- 6.3 OCIMF and INTERTANKO, although they recognise that there may be a technical need in some circumstances for new voluntary Class notations, are concerned by the proliferation of these notations(e.g. those relating to pollution prevention, fatigue life etc) and the lack of consistency in criteria of notations of similar nature between Classification Societies. This diverts from the importance of the fundamental Class requirements.
- 6.4 Whenever a new UR or amendment to a UR is proposed, the members of the Quality Advisory Committee should be circulated with the proposal at the same time as IACS members and invited to submit comments within a reasonable time frame. These comments should be debated by the relevant IACS Sub-Committee and should be provided to each society's technical committee before the final UR or amendment is agreed.

7 SURVEYS

- 7.1 OCIMF and INTERTANKO firmly believe that survey enhancing aspects of the voluntary notation of CAP (e.g. graphical representation of thickness measurements etc...) be included into the Enhanced Survey Programme process. Classification Societies and IACS should provide a proposal on how this should be achieved.

OCIMF and INTERTANKO also request that:

- 7.2 Classification Societies make it a strict requirement that readings of the Steel Thickness Measurements be recorded in a simple unified computerised format on spreadsheet.

- 7.3 Should a given survey be split between different survey stations and further/supplementary surveys be required in order to complete the survey, the remaining items to be dealt with must be clearly identified on a numbered list. When the remaining surveys are carried out, documentation should make specific references to the list from the previous survey.
- 7.4 Positive reporting as opposed to “negative reporting only” should be the rule. The survey reports should include a clear description of which compartments, structural elements, or machinery and what type of survey was done (overall, close-up). It should clearly describe the condition of each individual element surveyed and identify which items requires specific types of repair. By this way, the reporting would not be limited to the defective items identified during a survey but include every surveyed item.
- 7.5 The Special Survey restores a ship to be fully fit for purpose without condition or qualification relating to structure. This is a basic class requirement.
- 7.6 Whenever a surveyor is of the opinion that it is acceptable to defer any repair previously required to be carried out within a specific time frame by another surveyor, such contradictory decision should not be left to the discretion of the last surveyor alone, but referred to the highest technical authority within the Classification Society.

This section takes into account the proposals made in the document MEPC 45 / INF 22 submitted by IACS to the IMO Marine Environment Protection Committee which read as follows:

- *On ships of 20,000 tonnes deadweight and above, and subject to ESP, starting with Special survey No.3, all special and Intermediate surveys shall be carried out by at least two exclusive surveyors.*
- *Thickness measurements required in the context of hull structural classification surveys, if not carried out by the society itself or by a company subcontracted directly by the society shall be witnessed by a surveyor. This requires the surveyor to be on board, while the gaugings are taken, enabling him at any time to intervene and to control the process.*

These are measure is announced to be implemented from the 1 July 2001.

8 BUILDING

OCIMF and INTERTANKO are concerned that the trend towards "optimised" hull strength has led to the diminution of design scantlings, and approval of designs that are marginal against the lowest levels of fatigue life calculations. The replacement of empirically derived rules with calculations from first principles has resulted in reduced scantlings and therefore reduced scope for corrosion over the life of the ship compared with older designs.

OCIMF and INTERTANKO therefore request:

- 8.1 An increase in common Class standards by introducing an IACS Unified Requirement for the calculations of scantling.
- 8.2 Corrosion margins to be explicitly stipulated in the classification societies rules.

- 8.3 Classification Societies to minimise the current plate thickness accepted tolerance or exclusively permit positive tolerance. Most of the steel plates used for the construction of ships have a negative thickness which matches the -0.3 mm IACS accepted tolerance.
 - 8.4 Classification societies to include requirements for coatings of cargo tanks (top and bottom) similar to that required to ballast tanks and to include provision for the survey and monitoring of these coatings.
 - 8.5 A quality approval procedure for operational manuals, instructions and trouble shooting manuals for the critical machinery, systems and the equipment on board the vessel. This could be started at an early stage when the piece of equipment is approved by class.
 - 8.6 Technical documentation required to be approved by classification society should be available to the owner for scrutiny.
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Appendix VI – Port State Detentions

During the last years, INTERTANKO has continuously followed up the lists of tankers detained in European, Asian and North American ports with the aim of

- gaining an insight into this problem and enable the Association to achieve its main goals of SAFE TRANSPORT, CLEANER SEAS AND FREE COMPETITION
- helping its members achieve lower detention rates
- addressing Port State Authorities with relevant issues
- monitoring repeated offenders and if necessary reviewing/terminating the membership of members who have a pattern of serious port state detentions
- helping the tanker industry and the public to achieve a better overview of tanker detentions

INTERTANKO is also assisting Owners subjected to unjustified detentions, which happens from time to time. It should also be noted that with the exception of USCG's appeal procedure, there are no effective appeals` procedures in place in the different MOUs.

Whenever an INTERTANKO vessel is detain, we contact the member and ask for details. INTERTANKO's Council added the following membership criterion in April 2000:

“INTERTANKO's Executive Committee will review cases of repeated detentions of a Member's tanker(s) to determine whether membership should be terminated or suspended. The Executive Committee will take into account the severity of the detention and the performance of the Port State Control. The member will have the right to appeal”.

Appendix VII

Chemical carriers

The forthcoming revisions to MARPOL and the IBC Code must:

1. Provide maximum safety for the ships' crews and cargoes and enhance environmental protection.
2. Lead to reduced operational pollution by incorporating the use of the most appropriate technology today.
3. Recognise the clear and distinct differences between chemical and oil cargoes and the tankers in which they are transported.
4. Require that tanker owners and their crews engaged in the transportation of chemicals comply with the highest standards of operational care demanded by the trade.
5. Mandate that all new chemical tankers be equipped with a double hull as per regulation 13F of MARPOL Annex I, and, in addition, satisfy all the safety and pollution criteria (including damage stability and cargo tank location) of the IBC Code.
6. Mandate that all new chemical tankers meet the 100 litre stripping limit for all cargo tanks.
7. Require that all cargoes be evaluated according to the latest knowledge available concerning health risks, safety hazards and pollution damage.
8. Ensure that all cargoes transported by sea are classified and categorised by appropriate pollution and safety regulations.
9. Consider reducing the present five category system of MARPOL Annex II down to three categories to reflect the stricter stripping limits proposed:

Category 'X' High polluting cargoes which are not permitted to be discharged into the marine environment.
Category 'Y' Moderately polluting cargoes which can only be discharged into the marine environment under strictly controlled conditions.
Category 'Z' Cargoes which are considered to have little effect on the marine environment but nevertheless can only be disposed of under controlled conditions.
10. Ensure that the proposed harmonisation of MARPOL Annexes I and II does not compromise the higher safety and environmental standards of chemical tankers.
11. Lead to improvements in the existing chemical tanker fleet by implementing a structured phase out of vessels unable to comply with the new standards.