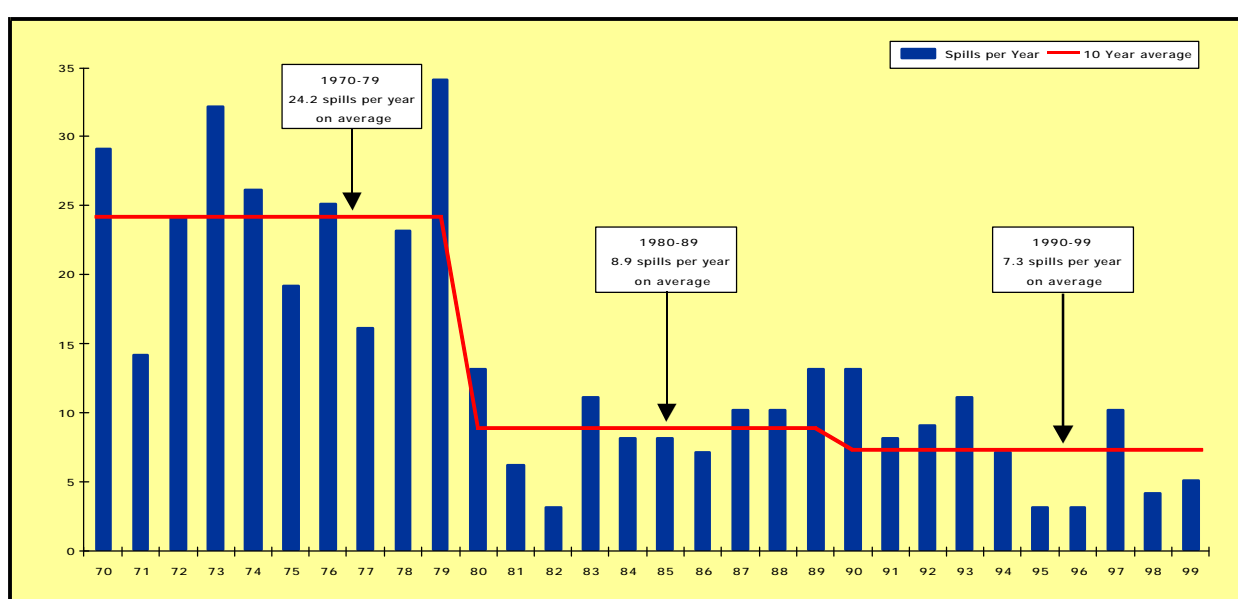


INTERNATIONAL TANKER OWNERS POLLUTION FEDERATION LIMITED

Comments to the International Commission on Shipping

1. INCIDENCE OF TANKER SPILLS

1.1. Prevention of oil spills is clearly the priority. As the graph below demonstrates, much has been achieved in this regard over the past two decades. Thus, the average number of tanker spills greater than 700 tonnes each year in the 1980s and 1990s was about one-third of that experienced in the 1970s. The average annual amount of oil lost as a result of tanker accidents has also been reduced since the beginning of the 1980s and now represents about 0.01% of the total quantity transported by sea each year.



Tanker Spills over 5000 barrels (700 tonnes), 1970-1999

1.2. In reviewing the data behind the above statistics it is noteworthy that there has been a major decline in the number of serious hull failures in recent years, probably as a result of the large number of older tankers that have been scrapped and the introduction in recent years of more rigorous ship inspection programmes. The five catastrophic hull failures that have occurred since 1992 and which have resulted in the tankers breaking in two have all involved product tankers carrying heavy fuel oil as cargo (see below).

This might suggest that attention should be given to this particular aspect of the oil transport industry rather than to all tankers.

TANKER NAME	YEAR	LOCATION	SPILL SIZE (tonnes)
KATINA P	1992	Mozambique	72,000
THANASSIS A	1994	South China Sea	37,000
NAKHODKA	1997	Japan	16,500
ERIKA	1999	France	15,000
VOLGONEFT 248	1999	Turkey	1,290

2. PARTICULAR PROBLEMS CAUSED BY SPILLS OF HEAVY FUEL OIL

2.1. Various factors determine the seriousness (and cost) of an oil spill, including the type of oil; amount spilled; rate of spillage; physical, biological and economic characteristics of the spill location; weather and sea conditions; and efficiency of clean-up. Of these factors one of the most significant is generally the type of oil, with heavy fuel oils being amongst the most problematical because of their highly persistent nature. This means that such oils are resistant to natural clean-up and are difficult to remove from the sea surface by booms and skimmers, chemical dispersants or any other means. Spills of heavy fuel oil therefore have the potential to travel great distances from the original spill location and to cause widespread contamination of coastlines and damage to amenity areas, fishing gear, mariculture facilities and wildlife.

2.2. This is well illustrated by the recent ERIKA and NAKHODKA spills in France and Japan, respectively. In both cases the problems were exacerbated by the fact that the oil was spilled a long way out at sea, increasing the potential for the oil to spread widely and to contaminate a long length of coastline. Very similar problems were experienced when the TANIO broke up off the north coast of Brittany in 1980. In this case the clean-up of the 14,500 tonnes of heavy fuel oil cargo that contaminated over 200 km of the Brittany coastline was in many ways just as difficult as for the 223,000 tonnes of crude oil from the AMOCO CADIZ which had affected the same area two years earlier.

Tuesday, June 13, 2000 1:59 AM

To: info@icons.org.au

Subject: International Commission on Shipping

To: Mr James Bell

Dear James,

As you are aware, ITOPF's main areas of competence are tanker spill statistics, oil spill response arrangements (including contingency planning), clean-up techniques, effects of spills on the environment and economic resources, and liability and compensation (including the admissibility of different classes of claims). None of these seems to be particularly germane to the list of issues to be examined by the Commission. Having said this, we would certainly be willing to offer any assistance that the Commission might find helpful, either during the visit to London or by correspondence. In the meantime I would offer the attached comments, which are extracted from a document we produced for another inquiry. The conclusion might be, why is one of the most 'nasty' pollutants seemingly often carried in some of the poorest quality tankers? Is this not one of the specific issues that deserves attention following the ERIKA (and NAKHODKA) incidents, albeit we are fully aware of some of the commercial and other issues involved? We have made this point to various groups and it appears that some have taken the point.

If you think that we can contribute anything else, please let me know.

Best regards,

Ian

Dr Ian White
Managing Director

Web: <http://www.itopf.com>