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 entertaini...
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 "TLm" parameter these should be shifted to Appendix II. The listing of such chemicals is herewith attached (Table 2).

Table 1

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

* 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
clorohydrins
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