



**Fair treatment**

- 1 Criminalisation
- 2 Shore access & visas
- 3 Medical treatment

**Crew competence**

- 1 Training requirements
- 2 Competence Management
- 3 Officer matrix

**Seafarer welfare**

- 1 Port berthing
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- 3.1 **Air Emissions**
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- 3.4 **Ship Recycling**

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# INTERTANKO

## Revised Strategic Work Plan 2023 For Council Approval

May 2023

INTERTANKO's Strategic Work Plan includes major issues, high-level actions and targeted benefits to Association Members in five **Main Focus Areas**:

1. **Safety and Technical**
2. **Human Element**
3. **Environment**
4. **Quality Operations**
5. **Commercial Sustainability**

This broad but focused engagement enables the Association to deliver three core services to Members, acting to serve its Members as:

**Advisor:** Facilitating and providing information, guidance and advice to Members on issues affecting their interests

**Forum:** Creating opportunities for industry professionals and owners to meet and share information and ideas with each other and the industry; and

**Champion:** Speaking on behalf of and acting for independent tanker owner Members

### ***Focus Areas and Expected Deliverables***

To provide a clear structure to the Strategic Work Plan and to maximise the Association's effectiveness across the **main focus areas, major issues** have been identified in each focus area with associated specific **issues** to address (see Table on page 4). Specific **High Level Actions (HLA)** and desired outcomes, i.e. **Member Benefits (MB)** have also been developed and are grouped by focus area.

### ***Tools and Processes***















INTERTANKO has developed a number of benchmarking and performance-monitoring tools to assist the implementation of the various actions as benefits for Members. Information is also collated and shared during Regional Panel and Committee meetings, as well as during workshops, seminars and presentations targeting a wider audience. INTERTANKO also disseminates information through publications and reports. Topical bulletins ranging in focus from bunker quality to security or vetting, as well as a weekly electronic newsletter, further supplement the information available on INTERTANKO's website and Member-only sections.

### ***Guiding Principles for Tactical Implementation***

- All work shall be in compliance with INTERTANKO's Anti-trust/ Competition Law Guidelines.

- The human element and safety culture shall be taken into account when developing HLAs and their desired outcomes.
- *Commercial and contractual implications shall be taken into account when developing HLAs and their desired outcomes*
- Risk assessment shall be used in developing HLAs and their desired outcomes.
- *Members and stakeholders' input shall be sought and incorporated into HLAs, as appropriate.*
- External advocacy shall be an integral part of each HLA.
- Advocate that regional and national authorities apply uniformity and consistency with international treaties when implementing maritime and environmental regulations.
- Regulatory and legal aspects of all issues shall be closely monitored for appropriate/ necessary engagement.
- Responding to Members' requests shall be a high priority.
- Lessons learned from incidents shall be used to identify tanker industry trends and mitigate future incidents and shall also be taken into account when developing HLAs and their desired outcomes.
- Where appropriate, the use of digitalisation in shipboard technologies shall be taken into account when developing HLAs and their desired outcomes.
- Where appropriate, issues shall be linked to one of the outputs listed in the IMO Strategic Plan (Resolution A.1110(30)).

Certain aspects come under the remit of specific Committees – currently these encompass the following:

	Associate Members Committee		Human Element in Shipping
	Technical and Safety Committee		Bunker Sub-Committee
	Offshore Tanker Committee		Nautical Sub-Committee
	Vetting Committee		Environment Committee
	Gas Tanker Committee		Chemical Tanker Committee
	Chemical Tanker Sub-Committee (Americas)		Insurance and Legal Committee
	Commercial & Markets Committee		Documentary Committee



1. SAFETY AND TECHNICAL	2. HUMAN ELEMENT	3. ENVIRONMENT	4. QUALITY OPERATIONS	5. COMMERCIAL SUSTAINABILITY
<p><b>1.1 Tanker design &amp; construction</b></p> <p>1.1.1 Application of CSR</p> <p>1.1.2 Classification standards</p> <p>1.1.3 Safety Criteria for EEDI compliant tanker designs</p> <p><b>1.2 Machinery &amp; equipment</b></p> <p>1.2.1 Lifesaving appliances</p> <p>1.2.2 Classification standards</p> <p>1.2.3 Anchoring and mooring systems</p> <p><b>1.3 Cargo</b></p> <p>1.3.1 Properties</p> <p>1.3.2 Safe entry into enclosed spaces</p> <p>1.3.3 Inert gas</p>	<p><b>2.1 Fair treatment</b></p> <p>2.1.1 Criminalisation</p> <p>2.1.2 Shore access &amp; visas</p> <p>2.1.3 Medical treatment</p> <p><b>2.2 Crew competence</b></p> <p>2.2.1 Training requirements</p> <p>2.2.2 Competence Management</p> <p>2.2.3 Officer matrix</p> <p><b>2.3 Seafarer welfare</b></p> <p>2.3.1 Cadet berthing</p> <p>2.3.2 Health and wellness</p> <p><b>2.4 Maritime Security</b></p> <p>2.4.1 Security</p> <p>2.4.2 Piracy</p> <p>2.4.3 Refugees</p> <p>2.4.4 Cyber risk management</p>	<p><b>3.1 Air Emissions</b></p> <p>3.1.1 Greenhouse gas emissions reduction</p> <p>3.1.2 Energy efficiency</p> <p>3.1.3 Onshore Power Supply</p> <p>3.1.4 MARPOL Annex VI (SOX, NOX, VOC)</p> <p>3.1.5 Alternative Fuels</p> <p><b>3.2 Ballast water management</b></p> <p><b>3.3 Biofouling and hull management</b></p> <p><b>3.4 Ship Recycling</b></p> <p><b>3.5 Waste Management</b></p> <p>3.5.1 On board waste management</p> <p>3.5.2 Shore waste reception facilities</p> <p><b>3.6 Places of Refuge</b></p> <p><b>3.7 Underwater noise</b></p>	<p><b>4.1 Vetting and Risk Management</b></p> <p><b>4.2 Port State Control</b></p> <p><b>4.3 Ports and Terminals</b></p> <p><b>4.4 Offshore operations</b></p> <p><b>4.5 Safe navigation</b></p> <p>4.5.1 eNavigation</p> <p>4.5.2 Pilotage</p> <p><b>4.6 Chemical tanker ops</b></p> <p><b>4.7 Gas tanker ops</b></p> <p><b>4.8 Fuel</b></p> <p>4.8.1 Quality</p> <p>4.8.2 Sampling</p> <p>4.8.3 Switching operations</p>	<p><b>5.1 Chartering</b></p> <p>5.1.1 Worldscale</p> <p>5.1.2 Charter party terms &amp; documentation</p> <p>5.1.3 Freight Demurrage</p> <p>5.1.4 Payment Performance</p> <p><b>5.2 Insurance &amp; Liability</b></p> <p>5.2.1 Marine Insurance</p> <p>5.2.2 Liability and Compensation regimes</p> <p>5.2.3 Sanctions</p> <p><b>5.3 Anti-corruption</b></p> <p><b>5.4 ESG Reporting</b></p>



# 1. Safety and Technical

## 1.1. Tanker design and construction

### 1.1.1 Application of Common Structural Rules (CSR)

**HLA:** Monitor the application of the CSR to ensure that there are similar, sensible results for tanker structures.

**MB:** Early warning on deviations from proper application of CSR which would save money through either avoidance of defects showing a short time after delivery, or through awareness of long-term consequences which might require expensive repairs/upgrades.

Common Structural Rules (CSR) were adopted by the International Association of Classification Societies (IACS) with the encouragement and assistance of INTERTANKO to ensure that shipyards build and construct tankers to the same minimum structural standards.

This prevents shipyards from building and constructing tankers to lesser, unsafe standards at a reduced cost. CSRs were audited by IMO GBS (Goal-Based Standards) for initial verification and will continue to be audited by IMO for future changes.

The INTERTANKO Secretariat will monitor enforcement of the CSR by the individual IACS members and Port State Control authorities to ensure that a level playing field is maintained for INTERTANKO Members.

The INTERTANKO Secretariat will monitor IMO's GBS verification audits for IACS CSRs and IACS Members' responses to the audit findings.

### 1.1.2 Classification standards

**HLA:** Ensure that INTERTANKO input is sought and incorporated, as appropriate, in the development of class standards for tanker design and construction.

**MB:** Advice of any necessary corrective actions required to meet class standards which would save money through either avoidance of defects showing a short time after delivery or through awareness of long-term consequences that might require expensive repair/ upgrades.

Each individual Classification Society has adopted their own rules for the design, construction survey and certification of tankers for classification purposes and to apply the Common Structural Rules which were adopted by IACS. These rules are developed and approved for implementation through each Classification Society's technical committee.

It is important to INTERTANKO Members that the INTERTANKO Secretariat and/or Members are involved in these committees to ensure that any classification standards developed for tankers are consistent with Members' interests, are fit for purpose and are not overly burdensome.

### 1.1.3 Safety Criteria for EEDI-compliant tanker designs

**HLA:** Monitor the IMO regulatory development to require further strengthening of EEDI level and the impact it may have on the design safety of application of such new regulations.



**MB:** Avoid at an early stage safety risks due to excessive requirements which are not sufficient specific allowing unsafe designs or unpowered of any tanker type and size.

IMO has adopted required design indexes in order to reduce GHG emissions from ships. Currently, IMO is considering strengthening these requirements beyond Phase III level. So far, the practice from shipyards is to reduce installed power on board ships but this is a measure with its own limitations for future solutions. INTERTANKO will be actively involved at IMO to monitor these developments while considering the application of such new requirements on different types on tankers / gas carrier types.

## 1.2 Machinery and equipment

### 1.2.1 Lifesaving appliances

**HLA:** Monitor, influence and update, as necessary, the international requirements and guidance for lifesaving appliances (LSA) to safely protect the ship's crew during drills and ship evacuations.

**MB:** Ability to train own personnel to undertake annual safety inspections without having to rely purely upon the services of manufacturers. Continued attention to this issue will increase safety and reduce accidents, two areas that will have positive monetary effects. However, the greatest effect will be on increasing seafarers' trust in the LSA equipment.

Chapter III of SOLAS and the Lifesaving Appliance Code contains extensive requirements for lifesaving appliances and arrangements for all ships, including tankers. In addition, the International Maritime Organization (IMO) has adopted and continues to develop numerous guidelines to supplement these requirements. It is necessary for INTERTANKO to actively engage at IMO to ensure that any lifesaving appliance regulations and guidelines applicable to tankers will adequately protect tanker crews at all times at sea, including during ship emergency and evacuation drills.

### 1.2.2 Classification standards

**HLA:** Ensure that INTERTANKO input is sought and incorporated, as appropriate, in the development of class standards for machinery and equipment installed on tankers.

**MB:** Avoid injuries to crew and expensive repairs of the machinery and equipment installed on tankers. Good maintenance should minimise expenses, but design improvements should result in lower maintenance costs of 50% or more by raising the bar of type approval standards.

Each individual Classification Society has adopted their own rules for the machinery and equipment on tankers for classification purposes. In addition, Classification Societies, acting on behalf of a Flag State, approve certain machinery and equipment installed on tankers in accordance with the requirements of SOLAS. These rules are developed and approved for implementation through each Classification Society's technical committee. It is important to INTERTANKO Members that the INTERTANKO Secretariat and/or Members are involved in these committees to ensure that any classification standards for machinery and equipment applicable to tankers are consistent with Members' interests, are fit for purpose and are not overly burdensome.

### 1.2.3 Anchoring and mooring systems



**HLA: Monitor the implementation of the revisions to IACS UR A1 and UR A3 for the design and construction of the ships' anchoring systems and the OCIMF guidelines on mooring systems.**

**MB: Improve safety of crew operating anchoring and mooring systems, particularly with regard to reducing serious accidents resulting from heaving the anchor. Engineer out and reduce the consequences of human error of such operations, particularly under difficult environmental conditions.**

Anchoring is a common and vital operation on any ship. However, it has been widely felt that anchoring equipment designs have not kept up with the evolving industry demand for anchoring ships in deeper and more exposed anchorages. When identifying the challenges associated with anchoring procedures, there was an evident need to review the minimum required construction standards of the windlasses, as vessels are currently anchoring at depths above their lifting capacity. Mitigating the safety risks associated with anchoring operations is paramount in an industry that has been striving to eliminate personnel injuries, prevent harm to the environment and limit damage to equipment.

INTERTANKO is regularly at the forefront of discussions in improving this vital area in all arenas and platforms – we have also introduced a guidance document 'Anchoring Guidelines a risk-based approach', which is available to download from the guidance section of [www.INTERTANKO.com](http://www.INTERTANKO.com). In addition, INTERTANKO took the initiative to establish a Joint Industry Working Group to consider possible, specific mitigating measures, through regulatory processes or through additional manufacturing standards to improve safe operations in deep waters and environmental conditions ships are often exposed to. Finally, INTERTANKO will attempt to work with Classification Societies and OCIMF to close the gap between the OCIMF MEG 4 and IACS standards for tankers.

## **1.3 Cargo**

### **1.3.1 Properties**

**HLA: Provide Members, where requested, with the necessary properties and characteristics of current and future tanker cargoes to safely carry them on board their tankers and identify new cargo potential / novel technologies for carriage of such cargoes**

**MB: Information related to the safe carriage of cargoes reducing the need to invest in in-house expertise while ensuring safe operations**

Oil, chemical and gas cargoes have different properties and characteristics that have safety implications for the crew and the tanker. It is important that all INTERTANKO Members are fully aware of the properties and characteristics of the cargo they are carrying on board their tankers. INTERTANKO can provide Members, when requested, with the necessary properties and characteristics of oil, chemical and gas cargoes to safely carry them on board their tankers. INTERTANKO also supports its members with new and future cargoes that may require novel technologies for their carriage and an understanding and knowledge of national and international regulatory regimes.

### **1.3.2 Safe entry into enclosed spaces and work permit**

**HLA: Monitor and update, as necessary, the appropriate requirements and guidance, including those for the carriage and use of gas and hazard detection equipment, to ensure the safe entry into enclosed spaces by personnel on board tankers. Provide guidance to assist Members on developing a risk assessment for permit to work on board tankers, particularly on gas carriers.**





**MB: Advice on the requirements for the safe entry into enclosed spaces and gas detection equipment, as well as associated training of crew, thereby reducing the risk that would come with undertaking such operations. In addition, ensure regulations and best practice guidance developed are such that shipboard burden is reduced.**

Ship's crew, repair crew and inspectors need to enter cargo tanks for a variety of reasons. It is absolutely essential that before they enter any cargo tank that tank is made safe for their entry. Requirements and guidelines for the safe entry of personnel into cargo tanks have been developed by IMO.

INTERTANKO provided input on and monitors the developments of these requirements and guidelines and then provides advice and guidance to Members to ensure they are fully aware of the latest requirements on safe tank entry and the related training of the crew.

Gas and hazard detection

Oil and chemical cargoes produce gases that accumulate within the ullage of the tank. Many of these gases can be dangerous to the crew and the tanker. It is crucial for the crew to be able to determine the gas levels in the cargo tanks to ensure they are maintained at safe levels. Requirements and guidelines for gas detection have been developed by IMO. INTERTANKO provided input on and monitors the developments of these requirements and guidelines and then provides advice and guidance to Members to ensure they are fully aware of the latest requirements on gas detection and the related training of the crew.

### **1.3.3 Inert gas**

**HLA: Assist with compliance with the appropriate requirements and guidance for inert gas systems (IGS) to ensure they are installed and operated safely on board tankers.**

**MB: Level playing field on who is required to install IGS and an overall increase in safety which produces a benefit across the entire industry.**

Chapter II-2 of SOLAS and the Fire Safety Systems Code contains extensive requirements for the design, installation and operation of inert gas systems to prevent explosions and fires in cargo tanks. In addition, IMO has adopted and continues to develop numerous guidelines to supplement these requirements. It is necessary for INTERTANKO to actively engage at IMO to ensure that the requirements for inert gas systems are fit for purpose for the various tanker types. INTERTANKO also advises Members on the inert gas requirements that are developed to ensure they are installed and operated safely on board Members' tankers.



## 2. HUMAN ELEMENT

### 2.1 Fair Treatment

#### 2.1.1 Criminalisation

**HLA:** Influence national decision makers and legislators to ensure that seafarers are not unjustly prosecuted.

**MB:** Advice and guidance to prevent seafarers on Members' tankers being prosecuted unjustly and reduce the negative aspects on seafarers and their employment.

On a number of occasions worldwide, seafarers have been unjustly prosecuted and, in some instances, incarcerated after a casualty or pollution incident, mainly for political reasons. INTERTANKO has and will continue to speak out against those who unjustly prosecute seafarers and engage decision makers and legislators to ensure that seafarers are not unjustly prosecuted.

#### 2.1.2 Shore access and visas

**HLA:** Influence national decision-makers and port authorities to ensure that seafarers are not unjustly denied access ashore.

**MB:** Advice and guidance to remove barriers so that seafarers are able to get ashore, resulting in improved morale amongst seafarers and a tangible benefit to improving safety. In addition, stores, equipment and personnel can be delivered to ships, allowing equipment to be maintained (so preventing a PSC detention) and personnel to visit or join ships.

On a number of occasions worldwide, seafarers have been denied access ashore. This has occurred for several reasons including, overly strict national security laws/regulations, over-zealous customs/immigration officials, unreasonable terminal requirements and on some occasions, unscrupulous attempts to collect money from seafarers. INTERTANKO has and will continue to speak out against those who unjustly deny seafarers their right enshrined in the Maritime Labour Convention to shore leave and engage port authorities to ensure that seafarers are legally granted access ashore.

#### 2.1.3 Medical treatment

**HLA:** Influence national decision-makers and port authorities to ensure that seafarers are not unjustly denied proper medical treatment ashore even during times of health emergencies.

**MB:** Advice and guidance on improving crew morale and the welfare of seafarers. A minor medical complaint can become a major one if early access to shore-side medical treatment is denied.

On a number of occasions worldwide, seafarers have been unjustly denied medical treatment ashore because of concern by port authorities over the potential spread of communicable diseases or declared public health emergencies from a port that may have been one of the ship's last ports of call. INTERTANKO has and will continue to speak out against those who unjustly deny seafarers medical treatment ashore and engage port authorities to ensure that seafarers are legally granted access ashore for proper and necessary medical treatment. In addition, INTERTANKO will advise Members when such



public health emergencies are declared so they can take appropriate actions to protect the seafarers on their tankers.

## 2.2 Crew competence

### 2.2.1 Training requirements

**HLA: Develop and monitor appropriate training requirements for seafarers to ensure they can properly operate all new equipment and systems on board tankers.**

**MB: Advice and guidance on training requirements for new equipment and systems are manageable, resulting in reduced training costs and improved tanker safety and pollution prevention.**

The IMO has directed a comprehensive review of the Standards of Training and Watchkeeping Convention (STCW). INTERTANKO will actively engage with the IMO throughout this multi-year review to ensure that the seafarers who are training under the revised Convention are trained and hold the correct competences to properly operate and manage members' ships.

### 2.2.2 Competency Management

**HLA: Create and implement behavioural competency assessment and verification (BCAV) and competency management guidance (ICMG) as tools for assessing on board competency, training requirements and managing promotions.**

**MB: Advice and guidance to increase the competence of crews, resulting in fewer accidents, detentions and increased operational efficiency of ships. Additionally, such a system should assist in the transition from a prescriptive crew matrix to one based on competency.**

BCAV developed with OCIMF and coupled with ICMG are flexible systems for assessing competency in seafarers. They can be adopted by all companies and incorporated into their existing assessment or appraisal systems, with the overall aim being to develop and improve officers' technical and soft skills. The associated assessments are part of a continuous improvement process rather than another exam that officers need to pass. In this way, it differs from pure technical competency systems such as those in the STCW Convention. Where possible, the lessons learned from applying the BCAV and ICMG will be fed into the comprehensive review of the STCW Convention.

### 2.2.3 Officer matrix

**HLA: Influence Energy companies and charterers that have developed officer matrixes for tankers they charter, to ensure reasonable requirements and, when appropriate, the acceptance of alternative requirements.**

**MB: Advice and guidance in meeting the various energy company/charterer requirements which may mean securing charters that might otherwise have been denied.**

Energy companies and charterers have developed officer matrices that contain the requirements that the officers on their tankers must comply with to serve on their tankers. These matrices include requirements for such things as time with company and time in rank. It is important that INTERTANKO actively engages with oil companies and charterers on behalf of Members to ensure that the officer matrices developed are reasonable and not impossible to meet. In addition, INTERTANKO can assist Members by providing guidance on how to comply with the various officer matrices particularly through the use of the BVAC and ICMG.



## 2.3 Seafarer welfare

### 2.3.1 Cadet berthing

**HLA:** Promote the inclusion of berthing for cadets as part of the appropriate requirements and guidelines for crew accommodation spaces.

**MB:** Advice and guidance on better organisation of crew accommodation spaces to include berthing for cadets to reduce wastage and comply with the INTERTANKO best practice on cadet berthing, resulting in a saving in training costs while reaping the rewards of the commitment to training.

In an effort to increase the number of qualified competent officers at sea and to safeguard the tanker industry of the future, INTERTANKO Members have agreed to a Best Practice to commit to enlisting Apprentice Officers (Cadets) for each tanker operated, where suitable, ensure certified cabin space exists onboard their tankers to accommodate them, and where it is possible, to enlist young, capable Cadets of a suitably qualified nature. In addition to recognising the trend in today's practice of restrictions in accommodation by shipyards, INTERTANKO Members further agree that new-buildings should include suitable certified cabin space for cadets as part of any new-building specification. INTERTANKO will continue to promote cadet berthing to assist Members in complying with this Best Practice.

### 2.3.2 Health and wellness

**HLA:** Provide guidance to facilitate the implementation of efficient practices for improving seafarer health and wellness.

**MB:** Advice and guidance as appropriate or necessary to ensure compliance with regulatory standards (ILO/MLC) for the requirements of monitoring of seafarer health and wellness.

The INTERTANKO Human Element in Shipping Committee (HEiSC) is actively involved in this area and have developed and provided guidance on physical and mental wellness. This guidance has included how shore staff can effectively manage such issues with an emphasis on mental wellness. The use of the internet on board was identified as one of the main risk factors in decreases in mental health. The committee developed and INTERTANKO published a Cyber Wellness Guide which provides direct guidance to seafarers and owners in the use of the internet on board ship. In response to the global pandemic, HEiSC have produced much guidance on the management of the crisis and the effects on seafarers and continues to provide guidance as the pandemic draws to an end. To assist in this process the results of a large-scale survey will be used to develop further advice to all stakeholders, including IMO.

## 2.4 Maritime Security

### 2.4.1 Security

**HLA:** Influence key stakeholders to ensure a proper response to physical attacks against shipping and monitor insecurity around the world where it presents a threat to members' ships and freedom of navigation

**MB:** Advice and guidance to protect tankers against physical attacks that may affect safe tanker operations.

Several regional conflicts around the world have threatened the safe navigation of shipping. The spill-over of the war in Yemen, the invasion of Ukraine and regional insecurity surrounding on-going conflicts between Israel and Iran have all affected members ships with several being attacked and casualties suffered. INTERTANKO has worked with other associations to develop best practice and intervene with regional



stakeholders and the wider UN to represent members' views and interests. INTERTANKO will continue to work with partners to develop best practice, provide advice on attacks and reduce the threat to shipping.

#### 2.4.2 Piracy

**HLA: Influence key stakeholders to ensure that policies and requirements ensure freedom of navigation worldwide and ensure that Members are suitably informed to enable them to protect tankers and crew from threats. Advise on commercial/contractual issues relating to piracy.**

**MB: Assistance with assessing regional piracy and security risks and deciding on appropriate preventative actions. Including appropriate commercial terms and insurance cover.**

The incidence of piracy and insecurity constitutes a grave threat to the lives of seafarers and the safe operation of ships. Historically, areas of particular concern have been off the coast of Somalia, the Gulf of Guinea, the Malacca Straits and insecurity around the Arabian Peninsula. INTERTANKO has been actively involved to addressing piracy and insecurity wherever it occurs through a number of actions, including the development of industry Best Management Practices, engaging with the UN and regional groups, working with IMO on the development of guidelines to administration and seafarers and engaging with individual states such as Nigeria to address specific risks in their territories. INTERTANKO will continue to ensure that its Members have the most up-to-date information so they can decide on the best measures they feel are appropriate to protect their tankers against acts of piracy and insecurity anywhere in the world.

#### 2.4.3 Refugees

**HLA: Influence decision-makers to take the appropriate steps to ensure the disembarkation of refugees rescued at sea.**

**MB: INTERTANKO is actively involved in highlighting the significant problems involved in rescuing large numbers of people, with a focus on the safety risks and ensuring that those rescued are disembarked earliest to reduce ship delays.**

The mass migration of persons and the use of the sea routes in the Aegean and Mediterranean Seas to seek refuge in Europe has not stopped and new areas such as in the seas off Myanmar have been seen. In many cases, the refugees are turning to smugglers who provide sea craft that are not suitable for crossing these seas, resulting in very unsafe conditions and the need for the refugees to be rescued at sea. When called on to assist in rescuing these refugees at sea, INTERTANKO Members' tankers respond. However, there is a need for a coordinated governments' approach to addressing the problem ashore. INTERTANKO has been, and will continue to, encourage governments to take the appropriate action to mitigate the need for rescuing refugees at sea and assist members in having those rescued, disembarked safely ashore as soon as possible to minimise risks to ships and ensure the health of those rescued.

#### 2.4.4 Cyber Risk Management

**HLA: Influence and monitor the development of any international and/or regional guidelines or requirements that would impact Members' tanker operations.**

**MB: Advice and guidance to protect tankers against cybersecurity attacks that may affect safe tanker operations.**

Electronic systems are essential to the operation and management of numerous systems critical to the safety and security of shipping and protection of the marine environment. However, the vulnerabilities created by accessing, interconnecting or networking these



systems can lead to cyber risks in many of the ships' systems, including bridge navigation equipment, cargo handling and main propulsion and machinery. MO has developed SOLAS requirements for cyber risk management. The shipping industry has prepared Industry Guidelines on Cyber Security which assist in the compliance with IMO regulations. INTERTANKO has been actively involved in the development of both and will continue to play an active role in updating these guidelines to ensure that Members have the most up-to-date information to protect their tankers. INTERTANKO has also published a guide on Jamming and Spoofing guidance, the first such guidance in this area.

## 3. Environment

### 3.1 Air emissions

#### 3.1.1 Greenhouse gas emissions reduction

**HLA:** Assist Members in complying with Energy Efficiency Design Index (EEDI), Energy Efficiency Existing Ship Index (EEXI), Carbon Intensity Index (CII) requirements and any future standards that may be developed within IMO or as commercial/contractual requirements. Represent Members in the IMO rule development on achieving the targets set by the IMO Initial Strategy for GHG emissions reductions and in dialogue with commercial stakeholders as appropriate.

**MB:** Advice and guidance on EEDI, EEXI and CII compliance so they can ensure that shipyards deliver more efficiently operated new ships and Members operate their existing ships more efficiently, resulting in a reduction of fuel consumption. INTERTANKO has been actively involved in the development of additional regulatory standards under the IMO Initial Strategy for GHG emissions reductions, particularly with the development of the associated IMO guidelines for the application of EEXI and CII regulations. Assist Members with associated commercial/contractual issues to ensure that they are not onerous/excessive. Develop contractual provisions and guidance as appropriate.

In addition to regulations on new ships to meet an Energy Efficiency Design Index (EEDI), IMO has further adopted amendments to MARPOL Annex VI to reduce greenhouse gas emissions from ships in Operation. The new requirements are limiting the use of power of ships in operations – EEXI – and define certain requested carbon intensity levels based on which ships' efficiency is rated via a Carbon Intensity Index (CII). INTERTANKO provided advice and guidance to Members to assist them in EEXI compliance and continue to provide assistance to Members on the complex application of the CII requirement so they can ensure a correct calculation of the CII attained value and of the CII rating. IMO is currently considering the possible introduction of Phase 4 level limits.

#### 3.1.2 Energy efficiency

**HLA:** Influence and monitor the development of international and/or regional requirements that would impact Members' tankers. Develop Guidance which could be useful to Members to monitor and assess their tankers' efficiency in operations. Monitor the emergence of contractual provisions related to energy efficiency.

**MB:** INTERTANKO develops guidelines for Members. INTERTANKO is also actively involved in the development of any energy efficient standards being considered both at IMO and in the EU to ensure the adoption of realistic, cost-effective requirements. Develop commercial/contractual terms relating to energy efficiency in accordance with Member needs/requirements.

IMO has adopted guidelines for the application of the EEXI and CII regulations as required in the IMO Initial Strategy for GHG emissions reduction from shipping. Consequently, enforcement and control of operational efficiency will require proper monitoring means. INTERTANKO has also develop a Guide which could provide valuable advice for the understanding of the IMO CII calculation methodology and ships' rating.

### 3.1.3 Onshore Power Supply

**HLA:** Engage with other industry stakeholders, CARB and EU, discuss OPS and SSE (shore side electricity), contribute to development of industry guidelines, and influence the relevant regulatory framework.

**MB:** Guidance on best practices to assess the tanker fleet operational performance monitoring procedures and methodologies in assessing the trend of the GHG emissions.

Identify the gap between the industry's readiness and the required technology under regulatory framework. Closely monitor the rapidly developing industry standards and regulations.

### 3.1.4 MARPOL Annex VI (SO<sub>x</sub>, NO<sub>x</sub>, VOC)

**HLA:** Promote the global use of clean fuels to reduce air emissions from ships and assist Members in making the right choices for their ships to comply with these air emission requirements.

**MB:** Advise Members on IMO 2020 SO<sub>x</sub> emissions limits provisions. Support Members with regard to means, technologies and operations to meet the NO<sub>x</sub> Tier III emissions limits, as appropriate. Develop commercial/contractual terms in accordance with Member needs/requirements.

Annex VI of MARPOL sets specific limits on certain air emissions from ships and its engines. Compliance with these standards can be achieved through the use of clean fuels or abatement technology. As a policy matter, the INTERTANKO Council has decided that promoting the global switch to marine gas oil is the best way to comply with these standards. However, it is recognised that each tanker owner has to decide which option is best for their tankers to comply with Annex VI requirements. To assist Members in deciding how best to comply with these requirements on their tankers, INTERTANKO provides advice and guidance on all aspects related to compliance with these requirements. INTERTANKO also produces contractual guidance and charterparty clauses to ensure everyone in the contractual chain complies with the limits on air emissions.

### 3.1.5 Alternative fuels

**HLA:** Monitor the uptake status of the various alternative fuels and develop technical and commercial guidelines for their safe and optimised use onboard ships, while advising the regulators and policy makers with member opinions, industry concerns and appropriate green solutions.

**MB:** Update the members with the properties of alternate fuels, their availability and scalability projections while providing detailed guidelines on their use ensuring safe, green and commercial tanker operations thus reducing potential incidents and claims.

Decarbonization of shipping through international and regional emissions compliance requirements has necessitated the development and use of alternative fuels within the shipping industry.

While INTERTANKO continues to engage with IMO, environmental regulators and stakeholders, championing member positions in regulatory development, the lack of industry experience in the safe and efficient use of such novel fuels, introduces new hazards that may impact safety of the crew and the tankers.



INTERTANKO supports its members by bringing about awareness of the different alternate fuels, their viability and scalability, which will assist them to understand the impacts of such alternate fuels on safety, environment and their commercial landscape.

INTERTANKO also provides a forum for discussing and sharing best practices for safe use of alternative fuels, while developing technical and commercial guidelines for their efficient handling onboard the vessels. Reskilling of seafarers is vital for safe adoption of alternative fuels and INTERTANKO considers the human factors when developing best practices for handling such novel fuels and technologies required for their use on tankers.

### 3.2 Ballast water management

**HLA: Assist Members in protecting marine biodiversity and complying with current and future regional and international ballast water discharge requirements.**

**MB: Advice and guidance on complying with applicable international, national and regional ballast water management (BWM) requirements with the objectives of assisting Members with finding solutions to the complex operational, technical and implementation challenges.**

The IMO's International Convention for the Control and Management of Ship's Ballast Water and Sediments (BWM Convention) has been in force since 2017 with fundamental requirements placed on Members, including compliance with the ballast water discharge standard, a BWM Plan and BW Record Book. However, there remain considerable practical and operational challenges in achieving full and consistent compliance with the ballast water discharge standards in all ports and at all times. INTERTANKO has actively engaged, and will continue to proactively engage, the IMO and other national and regional regulators to assist Members in finding solutions to the complex operational, technical and implementation challenges. Furthermore, based on Member feedback on implementing ballast water legislation and using ballast water management systems, INTERTANKO will seek to influence current and future regulations to ensure their implementation is rational and practical while continuing to protect marine biodiversity. In addition, INTERTANKO will work to ensure port State control enforcement is consistent, uniform and aligned with the intention of international ballast water legislation.

### 3.3 Biofouling and hull management

**HLA: Assist Members in protecting marine biodiversity by implementing current and future regional and international biofouling management requirements.**

**MB: Advice and guidance in complying with international, regional and national requirements. INTERTANKO continues to provide guidance on biofouling management and antifouling systems.**

International developments at the IMO and the increasing focus on marine biodiversity at a regional and national level means INTERTANKO Members will need to focus greater resources on the selection and application of appropriate antifouling coatings as well as effective biofouling management. INTERTANKO revised its *Guide to Modern Anti-Fouling Systems and Bio-Fouling Management* in 2020 which aims to assist Members in using appropriate coating systems for their ships and implementing effective biofouling management procedures. INTERTANKO will engage at the IMO level as it reviews and revises the Guidelines for the Control and Management of Ships' Biofouling to Minimize the Transfer of Invasive Aquatic Species 2011 while working with regional and national authorities to ensure effective, consistent and practical requirements are implemented globally.

## 3.4 Ship recycling

**HLA:** Assist Members with implementing current and future regional and international ship recycling requirements and ensuring safe and environmentally responsible ship recycling, globally.

**MB:** Advice and guidance on current and future ship recycling legislation and industry standards. Proactively influencing how any legislation will apply, the options available to recycle ships following globally established safety and environmental standards while ensuring Inventories of Hazardous Materials (IHMs) are developed, maintained and remain fit for purpose as a transparent tool for effective ship recycling.

INTERTANKO supports a sustainable and transparent global ship recycling industry and therefore the introduction of international environmental and safety standards for ship recycling through the entry into force of the Hong Kong Convention on Ship Recycling. Until the HKC is ratified and has entered into force, INTERTANKO will actively recommend the implementation of transparent and sustainable global ship recycling standards and industry initiatives that are aligned with the spirit and intent of the HKC. The European Union implemented the EU Ship Recycling Regulation 2013. INTERTANKO will provide feedback on implementing the requirements of the EU SRR and urge the application of consistent safety and environmental standards for global ship recycling facilities. To assist Members in complying with current requirements, INTERTANKO will continue to develop guidance to assist Members in complying with rules and regulations on the Inventory of Hazardous Materials (IHM).

## 3.5 Waste Management

### 3.5.1 On board waste management

**HLA:** Assist Members in minimising and managing waste on board tankers.

**MB:** Provide a platform for the sharing and consolidation of Members' best practice and management options for the minimisation of ship generated waste and cargo residues on board tankers.

While there remains an absence of onshore port reception facilities there will be a need to minimise the quantities of waste brought onboard ships and generated aboard. On-board waste management practices are evolving with better ship design, modern equipment and improved management practices. INTERTANKO strives to create a platform to share best practices on waste management on board in order to support the Association's zero-pollution ambition.

Best practice and guidance shared and developed by INTERTANKO's Members will be used to set industry standards and positively influence the shape of mandatory requirements for onboard waste management and delivery ashore. This will be achieved by effective and proactive dialogue with international (IMO), regional (EU) and national (USCG) regulatory authorities.

### 3.5.2 Shore waste reception facilities

**HLA:** Influence key stakeholders to ensure the provision of adequate port reception facilities globally and allow Members to implement a zero pollution and zero discharge strategy.

**MB:** Advice and guidance on properly disposing of ship-generated waste, reducing costs for use of waste reception facilities and in avoiding unnecessary port movements to discharge waste at a different berth or anchorage. In addition,

**INTERTANKO will highlight the challenges and present solutions that allow ships to meet zero-discharge ambitions and land all ship generated and cargo residues ashore.**

MARPOL requires parties to this convention to provide adequate reception facilities in their ports and terminals to receive ship generated waste and cargo residues without causing undue delay to ships. In addition, MARPOL and other regional and national authorities establish obligations requiring the adequacy of these reception facilities. Unfortunately, many ports and terminals do not have adequate reception facilities to meet Members' tankers needs.

INTERTANKO has actively engaged, and will continue to engage, with port authorities and terminals to ensure that adequate reception facilities for the discharge of ship generated waste and cargo residues are provided at a reasonable cost and with no delay. In addition, INTERTANKO will provide advice and guidance to Members to assist them in properly disposing of and minimising on board waste and cargo residues.

### **3.6 Places of Refuge**

**HLA: Influence national decision-makers to promptly provide appropriate places of refuge for a tanker in need of assistance.**

**MB: Up-to-date, real-time information on appropriate places of refuge for a tanker in need of assistance.**

When a ship has suffered an incident, the best way of preventing damage or pollution from progressive deterioration would be to lighten its cargo and bunkers and to repair the damage. Such an operation is best carried out in a place of refuge. However, to bring such a ship into a place of refuge near a coast may endanger the coastal State, both economically and from the environmental point of view, and local authorities and populations may strongly object to the operation. While coastal States may be reluctant to accept damaged or disabled ships into their area of responsibility due primarily to the potential for environmental damage, in fact it is rarely possible to deal satisfactorily and effectively with a marine casualty in open sea conditions.

Therefore, granting access to a place of refuge could involve a political decision which can only be taken on a case-by-case basis with due consideration given to the balance between the advantage for the affected ship and the environment resulting from bringing the ship into a place of refuge and the risk to the environment resulting from that ship being near the coast. To assist coastal states in the matter, IMO and the EU have developed guidelines on Places of Refuge for Ship in Need of Assistance. The purpose of these guidelines is to provide a common framework for all involved to assess the situation of ships in need of assistance. INTERTANKO played a major role in the development of these guidelines and will assist Members in obtaining the appropriate place of refuge if their tanker is the need of assistance.

### **3.7 Underwater noise**

**HLA: Assist Members in reducing their impact on marine biodiversity through the impacts of Underwater Radiated Noise (URN) by proactively and positively influencing the development of future regional and international guidelines and initiatives.**

**MB: Advice and guidance in the uptake of both international guidelines and regional requirements specific to Underwater Radiated Noise. INTERTANKO will continue engagement with industry stakeholders and regulatory authorities to provide advice and guidance on future guidelines and initiatives.**



The IMO's 2014 Guidelines on Underwater noise are now being reviewed with the aim of increased uptake and more detail as to where noise levels can be reduced and how this could be possible. Areas of mutual benefits with reductions in GHG emissions and the potential for voyage planning and management plans are all being proposed. INTERTANKO will continue to proactively engage at the IMO level as this review continues and advocate for uniform measurement methodologies for monitoring and recording.

## 4. QUALITY OPERATIONS

### 4.1 Vetting and Risk Management

**HLA:** Provide guidance and assistance aiming to lead Members in the global marine industry by promoting the safe and environmentally sound transportation of oil, chemicals and gas.

**MB:** INTERTANKO is closely engaged with OCIMF, CDI, Port Authorities, MoUs, Flag States, P&I Clubs and Classification Societies with the aim of ensuring a harmonised and commonly agreed inspection and assessment scheme. Members are supported in resolving vetting queries with individual energy companies and benefit from open and proactive communication channels with OCIMF, CDI and the Port Authorities. Members also share their expertise on day-to-day issues relating to vetting and clearance processes as well as clarifications on regulatory subjects. Members benefit from a collective approach in addressing issues which are raised by individual Members. INTERTANKO develops tools and processes aiming to assist Members to meet their aspirational level in Tanker Management Self Assessment (TMSA) and to excel in the maritime industry.

Vetting is the overall process of assessing and managing the marine risk, utilising tools and processes to provide information on vessels and companies that are being considered for business. Vetting is the INTERTANKO Members' "Ticket to Trade".

Prior to any potential cargo transaction that is offered by one or more charterers, both operator and tanker vessel are evaluated (screened) against a number of factors set out by the Oil Companies Marine Assurance Criteria.

One of the fundamental factors in this process is the physical inspection, which is conducted on board by accredited OCIMF and CDI inspectors, following the SIRE guidelines and CDI SIR questionnaires.

INTERTANKO has been actively engaged in the review process of the SIRE 2.0 questionnaire, is maintaining an open communication with OCIMF and is supporting its Members towards the transition to SIRE 2.0.

To assist Members in the vetting inspection process, INTERTANKO provides a number of tools, including: publications and guidelines; benchmarking tools on SIRE performance, TMSA, LTI, Crew retention and others; vessel inspection and PSC inspection feedback databases, and issuance and guidance on vetting clauses.

Members have a broad representation on INTERTANKO's Vetting Committee, which aims to:

- foster INTERTANKO Members' interests in relation to inspections and screenings performed by entities such as Port States, Energy companies, P&I Clubs, hull underwriters, terminals and others.

- reduce the proliferation and the cost of ship inspections which should be transparent and justifiable.

Committee members take an active part in developing resource materials for the wider membership as well as addressing topical vetting-related issues and providing a platform for the membership to liaise with and address their concerns with Port State Authorities and various vetting and ship inspection regimes.

### 4.2 Port State Control

**HLA:** Influence and monitor Port State Control (PSC) authorities to ensure that PSC inspections on Members' tankers are fair, equitable and in accordance with regional and international requirements.



**MB: INTERTANKO works to ensure that any potential detentions imposed on Members' tankers are justified and helps Members to ascertain that appropriate corrective action is taken to have a detention lifted and that non-justified detentions are withdrawn.**

Apart from helping members to avoid adverse PSC records and detentions of their ships that cause extensive detrimental impact on the commercial viability of a ship, the aim is for the worldwide tanker fleet to build on its current reputation of performing better than other shipping sectors. Through this, the tanker fleet helps contribute to the worldwide effort to eliminate substandard shipping and encouraging port state control resources to be devoted to other high-risk ships.

Various international conventions allow a Port State to conduct an inspection of a foreign ship entering its ports for the purpose of verifying that the ship is in compliance with the applicable international requirements. When significant deficiencies are found during a Port State Control inspection, the ship may be detained in that port until the deficiencies are corrected. The US Coast Guard conducts these Port State Control inspections in the US. A Port State Control Memorandum of Understanding (PSC MOU) has been established in various other regions of the world (e.g., Europe, Latin America, Asia, Caribbean, Indian Ocean, Black Sea, etc.) for the purpose of conducting these inspections for countries in these regions.

INTERTANKO represents its members at various IMO committee meetings which aim at continuously harmonising PSC inspection requirements to new and updated rules and regulations. INTERTANKO further engages with the PSC MoUs to make sure that Members' interests are taken into account. Where possible, information on developments in regions or countries, e.g., Concentrated Inspection Campaigns, are exchanged and shared amongst members.

For the most part, Port State Control inspections are fair and conducted in accordance with the convention requirements. However, there have been occasions where a ship has been unjustly detained as a result of a Port State Control inspection. If such an incident were to occur on a Member's tanker, INTERTANKO works on behalf of that Member to have the matter rectified as soon as possible and the detention removed.

INTERTANKO encourages its members to share experience following a PSC detention or issuance of unjustified observations aiming to formulate a proactive approach and set out actions for reoccurrence avoidance. INTERTANKO provides a means of reporting these concerns through feedback systems for commercial ship-vessel inspections and for Port State Control (PSC) Inspections.

This reporting system enables INTERTANKO Members to provide feedback on inspector behaviour and allows INTERTANKO to raise these concerns confidentially with relevant PSC authorities as appropriate. The objective of providing such a platform for Members to provide feedback confidentially is to ensure continuous improvement of ship inspections as well as the overall inspection procedures.

### **4.3 Ports and Terminals**

**HLA: Influence and monitor ports and tanker terminals to ensure good services are provided at a reasonable cost and on reasonable terms and assist Members with near real-time information on the tanker terminals worldwide.**

**MB: Up-to-date information on port operations, including accurate hydrographic data, allowing tankers to operate safely in ports. Advice and assistance on legal aspects of calling at a terminal.**

Members' tankers call at ports and terminals around the world. These ports and terminals should provide these tankers with safe, reliable service at a reasonable cost. In addition,



they should keep the tankers aware, through their agents, of any special requirements, needs or problems in advance of the tanker's arrival, such as up to date hydrographic information, so it can properly address the issue. Through INTERTANKO's Associate Members, there are an extensive number of shipping agents located around the world which can provide up-to-date information on port and/or terminal issues to assist INTERTANKO Members. When issues arise, INTERTANKO will engage on behalf of the Member, if appropriate, to assist in resolving the matter.

INTERTANKO can provide advice and assistance on the legal aspects of calling at a terminal including model clauses. In this respect INTERTANKO has produced the INTERTANKO Guide to Terminal Conditions of Use.

## 4.4 Offshore operations

**HLA: Influence and monitor the development of international and/or regional requirements that would impact Members' offshore tanker operations and assist Members in exchanging information on such operations.**

**MB: Advice and guidance on offshore tanker operations to ensure safe operations.**

A number of INTERTANKO Members operate shuttle tankers, Floating Production, Storage and Offshore (FPSO) units and Floating Storage Units (FSU) in offshore areas around the world. Operation of these types of tankers is different to normal tanker operations. To assist Members that operate these types of tankers, INTERTANKO has established an Offshore Tanker Committee to represent the interests of these types of tanker, provide regulatory updates affecting these types of tankers, exchange information on the operation of these types of tankers and develop training programs to address common safety issues on these types of tankers.

## 4.5 Safe navigation

### 4.5.1 eNavigation

**HLA: Influence and monitor the development of any international and/or regional eNavigation requirements that would impact Members' tankers.**

**MB: INTERTANKO is involved the development of eNavigation systems to ensure that they are fit for Members' needs and provide guidance on their use and implementation.**

E-navigation is intended to be the harmonised collection, integration, exchange, presentation and analysis of marine information onboard ship and ashore by electronic means to enhance berth to berth navigation and related services for safety and security at sea and protection of the marine environment. This will involve the integration of new and existing bridge technologies and equipment to enable the provision of globally harmonised maritime services. In this respect IMO has developed an e-navigation Strategy Implementation Plan and is working on a number of major issues to implement this plan. INTERTANKO fully supports the development of e-navigation with the focus of providing the ship all the information that is needed by the crew to safely navigate. However, there are certain entities that consider e-navigation as a vehicle to have shore personnel direct the navigation of the ship. INTERTANKO will be actively involved in the development of e-navigation at IMO to ensure that the safe navigation of Members' tankers remain under the control of the crew with the necessary guidance from shore personnel. Engagement will also continue with the IHO to ensure that the hydrographic data required for charts is able to be presented in the correct manner and that requirements developed in the IHO are compatible with the needs of members and can be implemented when integrated with IMO regulations.

#### 4.5.2 Pilotage

**HLA:** Assist Members in complying with pilotage requirements and address any problems that Members may have with pilots through the IMPA/APA Memorandum of Agreement with INTERTANKO.

**MB:** Assistance with a wide variety of pilotage-related issues, including the construction of pilot ladders, pilot boarding arrangements and under keel clearance. Interface with international and national pilotage organisations to resolve issues over navigational assistance and ensure safe operations.

Almost all countries around the world require ships to take on board a maritime pilot to assist the crew in the safe navigation of the ship through their navigable waters and ports. The pilotage requirements in each country are not all the same, resulting in problems that Members' tankers encounter when taking on a pilot. These include, but are not limited to, pilot standards, a clear understanding of the pilot's responsibilities, Master/pilot information exchange, bridge resource management, passage plans and communications. To assist Members with these issues INTERTANKO has signed a Memorandum of Agreement with the International Maritime Pilots Association (IMPA) to discuss and resolve issues that may arise between Members' tankers when taking on a pilot.

#### 4.6 Chemical tanker operations

**HLA:** Assist Members owning and operating chemical tankers with ensuring continuous improvement to safety, pollution prevention and overall efficiency of chemical tanker operations.

**MB:** Advice and guidance on chemical tanker operations to ensure safe operations.

Chemical tankers represent over a third of the INTERTANKO Members' tanker fleet. To assist Members that operate chemical tankers, INTERTANKO has established a Chemical Tanker Committee (CTC) to further the interests of independent chemical tanker owners with regard to the continuous enhancement of relevant safety issues and commercial, pollution prevention and regulatory matters, act as a link with the chemical industry and actively develop and maintain with organisations that are stakeholders in the chemical tanker industry. In addition, INTERTANKO has established the Chemical Tanker Sub-Committee Americas (CTSA) to assist Members with the technical and operational issues specific to independent chemical tanker owners trading in the North and South America regions.

#### 4.7 Gas tanker operations

**HLA:** Assist Members owning and operating gas tankers with ensuring continuous improvement to safety, pollution prevention and overall efficiency of gas tanker operations. It also assists its members for a smooth transition to the use of gas as alternate fuel.

**MB:** Advice and guidance on gas tanker operations to ensure safe & efficient operations and fair and balanced charterparty terms. It also acts as an advisor and a forum, for the adoption of gas as alternate fuels

The gas tanker fleet has grown considerably since the introduction of the Gas Tanker Committee in 2016. The gas fleet now represents approximately 20% of the INTERTANKO Members' fleet. The Gas Tanker Committee (GTC) continues to provide operational support and advice on various gas related issues. In addition, INTERTANKO will provide support on commercial issues affecting all aspects of gas tanker operations and chartering. In doing so, however, INTERTANKO is making a conscious effort to avoid duplication with the work of other gas tanker organizations such as SIGTTO, instead offering co-operation and a collaborative approach wherever possible.



Many of the alternate fuels have low flash point and are gases at ambient temperature. Which have been carried onboard gas ships as cargo. The GTC is utilizing this experience to provide all members with a platform for their decarbonization journey.

## 4.8 Fuel

### 4.8.1 Quality

**HLA: Develop and monitor the necessary requirements to ensure that fuel suppliers provide Members' tankers with fuels compliant with national and international requirements and contractual fuel specification/ charterparty terms.**

**MB: Avoid engine trouble, voyage delays and possible Port State Control (PSC) fines as well as reduce maintenance costs. Avoid bunker supply disputes.**

INTERTANKO Members have had considerable problems with fuel suppliers not providing fuel that is compliant with either IMO requirements or ISO standards, resulting in engine failures and power losses. To address this problem, INTERTANKO has made a number of proposals to IMO to require fuel suppliers to be held accountable if they do not provide compliant fuel to INTERTANKO Members. Recently, IMO has agreed with INTERTANKO to consider measures that can be taken to improve the quality of fuel provided to ships by fuel suppliers. Given that the 0.5% mass global sulphur cap will be implemented from 2020, INTERTANKO will continue to play an active role at IMO to ensure that the outcome of these measures is consistent with Members' needs.

### 4.8.2 Sampling

**HLA: Monitor and update procedures for sampling fuels to verify compliance with fuel specifications and to ensure compliance with national and international fuel requirements and contractual fuel specification/ charterparty terms.**

**MB: Avoid engine trouble, voyage delays and possible PSC fines as well as reduce maintenance costs. Avoid bunker supply disputes.**

Proper sampling of the fuel is essential in determining if the fuel complies with Members' requested fuel specifications and appropriate national and international requirements. IMO has expanded and, to some extent improved, its guidelines for fuel sampling. INTERTANKO will continue to play an active role at IMO to ensure that the practice of these guidelines is consistent with Members' needs, particularly with regard to the location of the MARPOL delivered sample.

### 4.8.3 Alternative Fuels

**HLA: Monitor the uptake status of alternative fuels and develop technical and commercial guidelines for their safe and optimised use onboard ships.**

**MB: Update the members with the properties of alternate fuels, their availability and scalability projections while providing detailed guidelines on their use.**

(See 3.1.5 Alternative fuels above for additional details)



## 5. Commercial Sustainability

### 5.1 Chartering

#### 5.1.1 Worldscale

**HLA:** Liaise with Worldscale Association to develop a good working relationship to represent Members' interests in dialogue over Tanker Nominal Freight Scale (Worldscale), and to ensure that Worldscale remains a useful, practicable chartering tool under changing conditions in the marketplace.

**MB:** INTERTANKO looks after Members' interests with Worldscale and provides input to the Worldscale Association when tanker operational conditions change.

Worldscale is a freight scale frequently used when tankers are fixed to carry oil cargoes on a voyage basis. Tankers are often fixed before the exact loading port(s) and discharge port(s) are known. The ownership of the cargo may also change whilst the tanker is at sea. The purpose of Worldscale is to provide the shipowner with same net return per day (i.e. freight less bunker costs, port charges, canal dues, etc.) irrespective of the voyage performed. Fixtures are made with reference to an agreed percentage of the flat rate – Worldscale 100. These flat rates are a set of dollar figures which give the freight per ton for each of a very large number of possible voyages. Apart from being a very useful tool for chartering, the Worldscale system also provides a shorthand method for comparing market levels. In addition, Worldscale increases transparency and facilitates competition. INTERTANKO has issued a publication, Worldscale – A Tanker Chartering Tool, to assist Members in fixing voyages for their tankers.

#### 5.1.2 Charterparty terms and documentation

**HLA:** Assist Members on charter party issues by developing model charter party clauses, issuing charter party publications and providing charter party and legal advice and guidance to Members.

**MB:** Enable Members to offer viable, balanced alternatives to onerous charter party clauses thereby realigning risk and providing certainty to avoid unnecessary disputes. Free legal advice on chartering issues has equally avoided or resolved what might otherwise be costly and damaging disputes.

INTERTANKO Members sign charter party contracts with charterers under which their tanker is hired to carry the charterer's cargo on a specified voyage or for a defined period. To assist in obtaining the best terms for these charter party contracts, INTERTANKO's Documentary Committee develops model charter party clauses. In addition, the Secretariat has developed charter party publications and provides legal advice/guidance on charter party contracts to allow Members to assess their rights and obligations and evaluate the potential risks contained in the standard charter party forms prepared by various charterers.

#### 5.1.3 Freight Demurrage

**HLA:** Assist Members with recovering undisputed debt in the form of outstanding freight, demurrage, disbursements, shifting expenses and deviation costs.

**MB:** INTERTANKO's intervention pressuring Charterers or other debtors who fail to acknowledge receipt or respond to a member's claim for a protracted amount of time.

The Freight and Demurrage Information Pool (FDIP) is a powerful tool that has led to the recovery of significant sums for INTERTANKO's Members. Apart from its primary function as a debt collection service, FDIP also acts as a "repository" aiming to raise membership



awareness on charterers failing to adhere to their business codes of conduct as well as their malpractices when it comes to claims' handling.

#### 5.1.4 Payment Performance

**HLA: Provide Members with tools to compare different charterers' payment performance and for INTERTANKO to effectively engage with charterers on their specific payment performance and claims-handling efficiency.**

**MB: The potential cost benefit for Members, if all freight and demurrage payments were made on time, is \$40m a year assuming half of the tankers registered with INTERTANKO are trading on the spot market with typical voyage/freight patterns and typical payment delays as per our trial data.**

Unless specifically agreed, the payment of freight is due to INTERTANKO Members on completion of discharge of the cargo, yet it is routinely being paid more than 10 days late. Similarly, demurrage which is due on submission of the documented claim, is being paid 85-130 days late. By recording, monitoring, and benchmarking these payment delays, the PPS provides a comprehensive overview of the state of affairs, giving Members a tool to compare different charterers' payment performance and benchmark their own payment recovery record with that of other Members. INTERTANKO can use the results (always combined figures only with no individual Members being identified) directly in dialogue with charterers, addressing and discussing their individual payment performance and claims handling efficiency with the goal of having these payment delays reduced. INTERTANKO has prepared a brochure explaining the details of the PPS, including the input required from Members, the output they would receive, and the value PPS can provide to Members.

## 5.2 Insurance and Liability

### 5.2.1 Marine insurance

**HLA: Influence insurers to provide appropriate coverage, monitor claim trends and advise Members of any major changes in coverage by insurers and trends in claim pay-outs to ensure that Members have the latest insurance information for their tankers.**

**MB: Appropriate insurance cover in place to address both existing risks and those that develop from new regulation and trade patterns.**

Marine insurance is necessary to provide a tanker owner with financial protection in case of damage or loss of the ship or its cargo. Protection and Indemnity insurance is a compulsory, third-party risks cover for shipowners using their vessels for commercial purposes. In addition, shipowners may wish to insure against physical loss and damage to their ships with hull and machinery insurance, loss or damage to cargo occurring during transit through cargo insurance and legal insurance for establishing or resisting a claim. There may be a need for a tanker owner to obtain additional insurance in special circumstances for such things as sailing in a war zone or when new regulations or trading patterns dictate the need for additional insurance. The Secretariat provides advice and guidance to Members on the coverage necessary for their particular voyage(s), any major changes in coverage by insurers and trends in claim pay-outs to ensure that Members have the latest insurance information for their tankers.

### 5.2.2 Liability and Compensation Regimes

**HLA: Support and maintain established regimes for oil pollution compensation including certainty, readily- available, adequate compensation for victims, strict liability, channelling of liability, breaking limitation, sharing of responsibility with oil companies and affordable/insurable financial limits.**



**MB: A robust and workable regime for compensation for oil pollution damage that balances the needs of the industry with adequate and prompt compensation to victims.**

As a result of pollution incidents from shipping, IMO has adopted a number of conventions dealing with the liability of the ship or cargo owner for damage suffered as a result of a pollution casualty and to ensure that adequate compensation is paid to victims affected by a shipping pollution incident. These include the 1992 International Convention on Civil Liability for Oil Pollution Damage (CLC), the 1992 convention establishing the International Oil Pollution Compensation Fund (Fund) and the protocol establishing an International Oil Pollution Compensation Supplementary Fund (Supplementary Fund).

Under the CLC, the liability onus is on the shipowner, but the Fund is made up of contributions from oil importers. The idea is that if an accident at sea results in pollution damage which exceeds the compensation available under the CLC, the Fund will be available to pay an additional amount, while the burden of compensation will be spread more evenly between shipowner and cargo interests. The Supplementary Fund provides an additional, third tier of compensation for oil pollution damage, but participation in the Supplementary Fund is optional. It is open to all Contracting States to the 1992 Fund Convention but those States that do not join will continue to enjoy their present cover under the current CLC/Fund regime.

In addition, there is the International Convention on Liability and Compensation for Damage in Connection with the Carriage of Hazardous and Noxious Substances by Sea (HNS Convention) and the HNS Protocol to address the liability and compensation requirements pertaining to pollution incidents involving hazardous and noxious substances, such as chemicals.

The Secretariat provides advice and guidance to Members on the requirements of these conventions and will play an active role in ensuring that any future requirements are practicable and reasonable.

### **5.2.3 Sanctions**

**HLA: Influence decision-makers to ensure sanctions are appropriate, workable and consistent and raise Member awareness of sanctions, the potential for breach of sanctions and associated risks.**

**MB: Avoid situations that might lead to potential breach of sanctions, thereby avoiding the severe penalties and restrictions on trade. Support Members in ensuring sanctions risks are properly covered in contracts/ charterparties through model clauses/ provisions.**

The United Nations, G7, EU and individual countries have imposed sanctions against certain countries around the world for a variety of reasons, ranging from economic and trade to more targeted measures such as arms embargoes, travel bans, and financial or commodity restrictions. INTERTANKO assists Members in dealing with sanctions in a number of major ways: ensuring that any sanctions imposed that may affect Members' tanker operations are fair, reasonable and practical to implement; ensuring that all Members are fully aware of any sanctions that could affect their tanker operations, thereby minimising the possibility of violating the sanction and avoiding potential penalties or trade restrictions; and developing documents and best practices endeavouring to ensure that Members do not inadvertently place themselves in breach of sanctions' requirements.

### 5.3 Anti-corruption

**HLA: Assist Members with issues related to facilitation payments to ensure they comply with charterers' anti-corruption charter party clauses. Influence and monitor developments in anti-corruption/ facilitation at IMO and elsewhere**

**MB: Advice on the risks of corrupt practices and work via collective action towards raising awareness of facilitation payments and in bringing such practices to an end.**

In certain places around the world, port authorities, port state control inspectors or government officials "request" payments, usually in case, before the tanker can conduct its business in these ports. In most cases, it is small amounts, but on occasion the payment requested is substantial. Most charterers include anti-corruption clauses in their charter party agreements. The Secretariat provides advice and guidance to assist Members in ensuring they comply with the anti-corruption charter party clauses. In addition when appropriate, the Secretariat will intervene with government and port authorities to cease these facilitation payments.

INTERTANKO participates in the Maritime Anti-Corruption Network and associated industry working groups/ collective action initiatives to raise awareness and to influence relevant state actors in driving out corrupt practices.

### 5.4 ESG Reporting

**HLA: Provide Members with guidance and tools for developing ESG Reports relevant to the tanker industry and monitor the development of mandatory ESG and non-financial reporting requirements.**

**MB: Establish and maintain tanker industry guidance and tools for Members with a view to establishing a common framework for Members to use and reference when developing their ESG Reports. Identify common reporting frameworks and minimise the administrative burden on member companies.**

Increasing regulatory focus on the reporting of non-financial and ESG-linked information is starting to affect tanker companies both directly and indirectly through requirements on financial institutions and charterers. The European Union is leading a number of sustainability and corporate governance initiatives which will eventually impact INTERTANKO's members. These include but are not limited to the Taxonomy Regulation and the Corporate Sustainability Reporting Directive. This has led to an increasing number of INTERTANKO's Members developing long-term sustainability strategies based on the environmental, social and governance (ESG) principles. INTERTANKO will provide guidance to Members in developing ESG Reporting and sustainability policies. In so doing, it will endeavour to establish a ESG Reporting framework that is specific to the tanker industry. As experience with and an understanding of the main ESG Reporting principles grows within the Membership, then the establishment of more detailed tanker-sector Standards may be considered in the future.

INTERTANKO will actively engage with regulatory authorities and third-party stakeholders on ESG Reporting with a view to sharing information with the Membership and assessing and influencing the technical, practical and commercial implications of any mandatory requirements and industry-led initiatives that have a direct impact on INTERTANKO's members. (See also [3.1.1 Greenhouse gas emissions reductions](#)).

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**INTERTANKO**

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