



International Oil Pollution
Compensation Funds

Agenda item 5	IOPC/NOV25/5/1	
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Original	English	
1992 Fund Assembly	92A30	●
1992 Fund Executive Committee	92EC85	
Supplementary Fund Assembly	SA22	●

SUBMISSION OF OIL REPORTS

Note by the Secretariat

Summary:	<p>For the year 2024, 124 reporting entities (121 Member States plus autonomous partners Aruba, Curaçao and Sint Maarten) were liable to submit oil reports. As at 1 October 2025, 95 reporting entities have submitted reports for 2024 to the 1992 Fund, representing an estimated 97% of the expected total contributing oil. Oil reports are outstanding from 31 reporting entities (30 Member States plus one autonomous partner) with respect to the 1992 Fund, of which 29 have not completed reporting for the year 2024.</p> <p>As at 1 October 2025, one Member State has not submitted reports for 2024 to the Supplementary Fund. All other Member States have completed submissions.</p>
Action to be taken:	<p><u>1992 Fund Assembly and Supplementary Fund Assembly</u></p> <p>Information to be noted.</p>

1 Introduction

- 1.1 This document sets out the status of the submission of oil reports in respect of the 1992 Fund and the Supplementary Fund. It also provides an update on the development of the online reporting system (ORS) for the submission of oil reports by Member States, as well as measures taken to encourage the submission of oil reports.
- 1.2 In January 2025, the Director invited 1992 Fund and Supplementary Fund Member States to submit their 2024 contributing oil reports to the Secretariat by 30 April 2025. Member States were also asked to provide any outstanding reports from previous years. The Secretariat keeps a contributor list for each State and shared these lists, along with past oil receipt data, to help States complete their current reports.
- 1.3 Since April 2025, reminders have been issued on a monthly basis to States with pending oil reports, followed by meetings with the competent authorities of Member States with outstanding reports.
- 1.4 Clarification is sought from Member States when oil reports are incomplete or inconsistent with previous data. Starting in 2025, the Secretariat has systematically checked for significant discrepancies between reported contributing oil quantities and trade data provided by Refinitiv Eikon, requesting additional information from Member States where discrepancies are identified.

2 Situation with regards to outstanding reports

2.1 1992 Fund

- 2.1.1 For the year 2024, 124 reporting entities (121 Member States plus autonomous partners Aruba, Curaçao and Sint Maarten) were liable to submit oil reports. As at 1 October 2025, 95 reporting entities have submitted reports for 2024, representing an estimated 97% of the expected total contributing oil. This represents a stronger reporting performance than in September 2024, when the 1992 Fund had received reports for 91% of the expected contributing oil.
- 2.1.2 Reports indicate that oil received in 2024 has decreased by about 2% compared to 2023, with an estimated 1.47 billion tonnes expected for 2024.
- 2.1.3 As at 1 October 2025, 31 reporting entities (30 Member States plus one autonomous partner) had not completed the submission of reports on contributing oil for 2024 or prior years, as shown at the Annex, of which 29 reporting entities have outstanding reports for 2024. It is expected that 'nil' quantities will be reported by 17 of the reporting entities yet to submit.
- 2.1.4 Of the 17 reporting entities with reports outstanding for more than one year, the Dominican Republic and Syrian Arab Republic have not submitted any reports since joining the 1992 Fund, 26 years and 16 years ago, respectively. Oil reports have been outstanding from Albania for 12 years (2013–2024), Saint Lucia for 10 years (2004–2013), Djibouti for eight years (2017–2024), Bahrain for seven years (2018–2024) and Guinea for seven years (2018–2024).
- 2.1.5 In 2025, Panama completed the submission of outstanding oil reports for the period 2018–2023. Further details are provided in document IOPC/NOV25/5/4.
- 2.1.6 Senegal also completed the submission of its outstanding oil reports in 2025, which had previously covered a period of six years (2019–2024). Further details are also provided in document IOPC/NOV25/5/4.

2.2 Supplementary Fund

As at 1 October 2025, Congo had not submitted oil reports for 2024. All other Member States, have completed the submission of oil reports.

3 Reporting arrangements for Denmark

On 17 September 2025, Denmark and the Faroe Islands declared that the Faroe Islands would independently submit oil reports to the 1992 Fund and the Supplementary Fund. While remaining part of the Kingdom of Denmark, the Faroe Islands have assumed full legislative responsibility over maritime law through the Danish Merchant Act, including the implementation of the 1992 Civil Liability Convention, the 1992 Fund Convention and the Supplementary Fund Protocol. The Secretariat will therefore expect separate oil report submissions from the Faroe Islands for 2025.

4 Online reporting system (ORS)

- 4.1 An online reporting system (ORS) has been developed to assist Member States in the submission of their contributing oil data to the Secretariat.
- 4.2 The Secretariat is developing an online Hazardous and Noxious Substances (HNS) reporting system, incorporating reporting and contributions management. Oil reporting will be one element of the HNS reporting system, and upon its deployment, the existing ORS for the 1992 Fund and the Supplementary Fund will be integrated into this new platform.

- 4.3 Consequently, the Secretariat plans to update the reporting methodology, and it is expected that all Member States of the 1992 Fund and the Supplementary Fund will submit oil reports exclusively through the online system, rather than by email or postal mail.

5 Measures encouraging the submission of oil reports

- 5.1 In recent years, competent authorities have been reminded of the governing bodies' concerns about States not fulfilling their treaty obligations to submit reports, which are crucial for the functioning of the international compensation regime.
- 5.2 Under 1992 Fund Assembly Resolution N°12, in the event that a State Party to the 1992 Fund Convention has two or more oil reports in arrears, or has any contributors who are in arrears with their payments for two or more years, any claim submitted by the administration of that State or a public authority working directly on the response or recovery for the pollution incident on behalf of that State will be assessed for admissibility, but payment will be deferred until the reporting deficiency is rectified.
- 5.3 Furthermore, States that are determined by the 1992 Fund Assembly to be in breach of their obligations under Articles 13.2, 15.1 or 15.2 of the 1992 Fund Convention shall not be eligible to nominate candidates for membership of the Audit Body nor to be elected as members of the 1992 Fund Executive Committee.
- 5.4 Under Supplementary Fund Assembly Resolution N°3, in the event that a State Party to the Supplementary Fund Protocol has any contributors who are in arrears with their payments for two or more years, any claim submitted by the administration of that State or a public authority working directly on the response or recovery for the pollution incident on behalf of that State will be assessed for admissibility, but payment will be deferred until the reporting deficiency is rectified.
- 5.5 In September 2025, Member States of the 1992 Fund with oil reports or contributions outstanding for two or more years were notified by a formal letter that Resolution N°12 was applicable to them. Information on Member States to which 1992 Fund Assembly Resolution N°12 and Supplementary Fund Assembly Resolution N°3 are applicable as at 1 October 2025 can be found in document IOPC/NOV25/5/3.
- 5.6 At their November 2023 sessions, the governing bodies adopted 1992 Fund Assembly Resolution N°13 and Supplementary Fund Assembly Resolution N°5 authorising the Director to issue invoices based on estimates. They also adopted the relevant amendments to the Internal Regulations of the 1992 Fund and the Supplementary Fund (document [IOPC/NOV23/11/1](#), paragraphs 6.2.25 and 6.2.26). A summary of the implementation of these Resolutions is set out in document IOPC/NOV25/5/4.

6 Director's considerations

- 6.1 The Director is grateful for the continued cooperation and engagement of Member States with respect to the submission of oil reports.
- 6.2 The Director notes with concern that eight Member States of the 1992 Fund have outstanding reports for five or more years and that two States have never submitted reports despite being Members of the 1992 Fund for many years.

- 6.3 Ongoing work is required to ensure that all Member States continue to fulfil this important obligation under the 1992 Fund Convention and the Supplementary Fund Protocol. The Director strongly encourages all 1992 Fund and Supplementary Fund Member States to support the Secretariat in this matter.

7 Action to be taken

1992 Fund Assembly and Supplementary Fund Assembly

The 1992 Fund Assembly and the Supplementary Fund Assembly are invited to take note of the information contained in this document.

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ANNEX

Non-submission of oil reports by Member States, as at 1 October 2025

	Member State	Number of oil years outstanding	Tonnage given in most recent complete report	Years for which reports are outstanding	
				1992 Fund	Supplementary Fund
1	Dominican Republic ^{<1>}	26	No reports received	1999-2024	
2	Syrian Arab Republic ^{<1>}	16	No reports received	2009-2024	
3	Albania ^{<1>}	12	0	2013-2024	
4	Saint Lucia ^{<1>}	10	648 077 (2024)	2004-2013	
5	Djibouti ^{<1><2>}	8	167 042 (2016)	2017-2024	
6	Bahrain ^{<1>}	7	0	2018-2024	
7	Guinea ^{<1><2>}	7	173 942 (2017)	2018-2024	
8	Dominica ^{<1>}	5	0	2020-2024	
9	Cameroon ^{<1>}	4	0	2020, 2022-2024	
10	Palau ^{<1>}	4	0	2021-2024	
11	United Republic of Tanzania ^{<1>}	4	150 224 (2020)	2021-2024	
12	Comoros ^{<1>}	3	0	2022-2024	
13	Bahamas	2	6 315 030 (2022)	2023-2024	
14	Georgia	2	0	2023-2024	
15	Saint Kitts and Nevis	2	0	2023-2024	
16	Vanuatu	2	0	2023-2024	
17	Venezuela (Bolivarian Republic of) ^{<2>}	2	4 935 036 (2022)	2023-2024	
18	Benin	1	0	2023	
19	Côte d'Ivoire	1	3 358 498 (2023)	2024	

	Member State	Number of oil years outstanding	Tonnage given in most recent complete report	Years for which reports are outstanding	
				1992 Fund	Supplementary Fund
20	Colombia	1	2 236 334 (2023)	2024	
21	Congo	1	0	2024	2024
22	Grenada	1	0	2024	
23	Iran (Islamic Republic of)	1	16 062 194 (2023)	2024	
24	Kiribati	1	0	2024	
25	Madagascar	1	0	2024	
26	Mozambique	1	1 517 329 (2023)	2024	
27	Nigeria	1	0	2024	
28	Niue	1	0	2024	
29	Sint Maarten (Kingdom of the Netherlands)	1	0	2024	
30	Sri Lanka	1	2 718 986 (2023)	2024	
31	Tunisia	1	1 073 622 (2023)	2024	

<1> The measure to defer payments of compensation under 1992 Fund Assembly Resolution N°12 is applicable due to oil reports outstanding for two or more years, i.e. reports for the year 2022 and before as at 23 September 2025.

<2> The measure to defer payments of compensation under 1992 Fund Assembly Resolution N°12 is applicable due to contributions outstanding for two or more years, as at 23 September 2025.