



International Oil Pollution
Compensation Funds

Agenda item 1	IOPC/NOV25/1/3	
Date	14 October 2025	
Original	English	
1992 Fund Assembly	92A30	●
1992 Fund Executive Committee	92EC85	
Supplementary Fund Assembly	SA22	●

REVIEW OF INTERNATIONAL NON-GOVERNMENTAL ORGANISATIONS HAVING OBSERVER STATUS

Note by the Secretariat

Summary:

Every three years, a review is carried out of international non-governmental organisations having observer status in order to determine whether the continuance of this status is of mutual benefit. The last review was held in March 2022. The next review is therefore set to take place at the November 2025 meeting of the governing bodies.

To facilitate such a review, this document lists the organisations that currently have observer status with the IOPC Funds, and provides information regarding their attendance at and submission of documents to meetings, as well as contact the Secretariat has had with these organisations since the last review in March 2022. Statements by these organisations concerning the continuance of observer status are also provided in Annex III.

Action to be taken: 1992 Fund Assembly

- (a) Establish a group of five States with the mandate to consider the information provided by the Secretariat concerning the relationship between the Funds and the international non-governmental organisations and, taking that information into account, consider whether the continuance of observer status for each organisation is of mutual benefit and report its findings to the governing bodies; and
- (b) Decide whether, having taken note of the report of the group of five States, the continuance of observer status for each international non-governmental organisation is of mutual benefit.

Supplementary Fund Assembly

- (a) Take note of the decisions of the 1992 Fund Assembly; and
- (b) Decide whether to divert from the decision of the 1992 Fund Assembly on the continuance of observer status in respect of a particular organisation.

1 Granting of observer status

- 1.1 Pursuant to Article 18.10 of the 1992 Fund Convention and Article 16.2 of the Supplementary Fund Protocol, the Assemblies of the respective Funds shall determine which non-Contracting States and which intergovernmental and international non-governmental organisations shall be admitted to take part, without voting rights, in meetings of the Assemblies and subsidiary bodies.
- 1.2 At its June 1996 session, the 1992 Fund Assembly adopted guidelines on relations between the International Oil Pollution Compensation Fund, 1992 and intergovernmental organisations and international non-governmental organisations (1992 Fund Observer Status Guidelines), which set out, *inter alia*, the criteria for the granting of observer status (document [92FUND/A.1/34/1](#)). These Guidelines were amended at the 1992 Fund Assembly's October 2002 session in respect of international non-governmental organisations, to include provisions for a periodic review of whether such organisations continue to fulfil the criteria set out in the Guidelines and for the granting of observer status on a provisional basis. Further minor amendments have been introduced by the 1992 Fund Assembly at subsequent sessions, and the current text, as adopted in April 2018 is reproduced in Annex I.
- 1.3 At its March 2005 session, the Supplementary Fund Assembly decided that intergovernmental organisations and international non-governmental organisations that had been granted observer status in respect of the 1992 Fund should have observer status with the Supplementary Fund, unless the Assembly of the Supplementary Fund decided otherwise in respect of a particular organisation. In light of this decision, the Supplementary Fund Assembly decided that there was no need for the Supplementary Fund to have its own set of guidelines (document [SUPPFUND/A.1/39](#), section 4).
- 1.4 The following international non-governmental organisations currently have observer status with the IOPC Funds:

Organisation	Year status acquired
BIMCO	1980
Cedre	2018
Comité Maritime International (CMI)	1980
Conference of Peripheral Maritime Regions (CPMR)	2002
European Chemical Industry Council (Cefic)	1997
Ibero-American Maritime Law Institute (IIDM)	2017
International Association of Classification Societies Ltd (IACS)	2006
International Chamber of Shipping (ICS)	1980
International Group of P&I Associations (International Group)	1980
International Salvage Union (ISU)	1996
International Spill Control Organization (ISCO)	2013
International Union of Marine Insurance (IUMI)	2005
INTERTANKO	1985
ITOPF	1980
Oil Companies International Marine Forum (OCIMF)	1980
Sea Alarm Foundation (Sea Alarm)	2017
World Liquid Gas Association (WLGA)	2009

2 Procedure for review

- 2.1 Paragraph B.4 of the 1992 Fund Observer Status Guidelines provides for the possibility of the withdrawal of the observer status granted to an international non-governmental organisation if the Assembly considers that there is no further advantage to the 1992 Fund in continuing with that status or if any conflict of interest arises or is likely to arise between the respective activities of the 1992 Fund and the organisation concerned.
- 2.2 Paragraph B.5 of the 1992 Fund Observer Status Guidelines provides that the Assembly will review the list of international non-governmental organisations having observer status every three years to determine whether the continuance of observer status for any particular organisation is of mutual benefit.
- 2.3 The last review was due to be conducted at the November 2021 meeting of the governing bodies. However, due to the reduced time available for agenda items at that meeting, which was held remotely due to the COVID-19 pandemic, the observer review was postponed to the March 2022 meeting. The results of that review are set out in document [IOPC/MAR22/9/2](#).
- 2.4 The Director proposes that the same procedure be followed as in all previous reviews, whereby a group of five States is established to consider whether the continuance of observer status for any particular international non-governmental organisation is of mutual benefit and to report its findings to the governing bodies (paragraph B.2 of the 1992 Fund Observer Status Guidelines).

3 Information on engagement between the IOPC Funds and the organisations subject to the review

3.1 Attendance at meetings and submission of documents

- 3.1.1 An overview of the attendance of international non-governmental organisations having observer status at the meetings of IOPC Funds' governing bodies during the three-year period since the previous review in March 2022 is in Annex II.
- 3.1.2 Only one organisation, the International Group, submitted a document to the meetings during that period.

3.2 Comments from non-governmental organisations

In July 2025, the Secretariat wrote to all international non-governmental organisations having observer status, informing them of the upcoming review and invited comments on whether, in the view of these organisations, the continuance of observer status was still of mutual benefit. Responses were received from all of these organisations and are reproduced in Annex III.

3.3 Contact with the Secretariat

- 3.3.1 The IOPC Funds held an Induction Course for States and organisations with observer status to the IOPC Funds in April 2025. Until then, these courses had been open to delegates from Member States only. This was the first Induction Course focusing specifically on delegations holding observer status, providing a valuable opportunity to engage on matters of mutual interest. The non-governmental organisations represented were Cedre, IACS, ICS, OCIMF and WLGA.
- 3.3.2 The International Group, ICS, ITOPF and INTERTANKO continued to support the IOPC Funds' week-long Annual Academy for Member States as speakers in 2023, 2024 and 2025.
- 3.3.3 The Director and other members of the Secretariat engage regularly with the International Group and ITOPF, working closely on the day-to-day activities of the IOPC Funds, and contributing to a

variety of conferences and training courses to promote a better understanding of the international liability and compensation regime.

- 3.3.4 The IOPC Funds have participated in multiple workshops with the International Group and ITOPF, including joint events in Peru (March 2023), Japan (October 2023), New Zealand (September 2023), India (January 2024), Malaysia (May 2024), the Philippines (November 2024), Brunei Darussalam (January 2025), Slovenia (June 2025), Madagascar (July 2025), South Africa (July 2025) and Fiji (September 2025) to promote the international liability and compensation regime. They also contributed to a workshop on claims and compensation for Copenhagen Agreement States (October 2025) and participated in claims exercise in Canada (September 2025).
- 3.3.5 Multiple online workshops were also delivered in collaboration with ITOPF. These included events for Ecuador (October 2024), Singapore (July 2024), Kenya (May 2025), Ireland (November 2025) and Japan (February and September 2025).
- 3.3.6 The IOPC Funds has also jointly held an exhibition stand with the International Group at international conferences, including Interspill (the Netherlands, June 2022), Spillcon (Australia, September 2023), Oil Spill India (India, September 2024) and Interspill (United Kingdom, April 2025). It also collaborates with Cedre and ITOPF on the Interspill organising committee.
- 3.3.7 The International Group and ICS are in regular contact with the Secretariat. Their views are often sought on relevant policy matters and they have contributed, together with ITOPF, to the development of a number of key guidance documents and other publications, including the ongoing IOPC Funds' project relating to the development of a Claims Manual for the 2010 HNS Convention. OCIMF have also provided assistance and engaged with the Secretariat intersessionally on a number of policy matters.
- 3.3.8 In September 2022, the IOPC Funds' Secretariat visited ITOPF's offices and in March 2025, ITOPF staff were invited to the IOPC Funds' offices. The visits offered new staff on both sides an overview of each organisation's role and allowed the Secretariats to reconnect, exchange information, share practices, and review recent incidents and developments. IOPC Funds' Director, Gaute Sivertsen, also attends the annual ITOPF board meeting.
- 3.3.9 The IOPC Funds often collaborates with Sea Alarm on training activities and welcomed officials from the organisation to its London offices in February 2023, where discussions focused on recent work and activities regarding wildlife preparedness and response.
- 3.3.10 Cedre has maintained strong contacts within the IOPC Funds and shares information resources with the Secretariat. The IOPC Funds have regularly been invited to deliver presentations during Cedre's annual Information Day.
- 3.3.11 CMI and the IOPC Funds have continued to work closely on shared priorities. In May 2025, the IOPC Funds took part in a panel on the future of the IOPC and HNS Funds at the CMI Colloquium in Japan.
- 3.3.12 In June 2022, Cefic joined the IOPC Funds to deliver training on the 2010 HNS Convention at the Interspill Academy and actively contributed to the 2010 HNS Convention workshop held in April 2024.

4 Director's considerations

- 4.1 The Director recalls the observations made by the observer review group during the March 2022 sessions of the IOPC Funds' governing bodies (see document [IOPC/MAR22/9/2](#), paragraph 5.2.13). In particular, he recalled the group's view that it was important that all organisations having observer

status with the IOPC Funds attended meetings of the governing bodies regularly and sustained engagement with the organisation intersessionally.

- 4.2 As set out in Annex II, most non-governmental organisations with observer status with the IOPC Funds have continued to regularly attend meetings and have participated actively in those meetings. However, there are some organisations whose attendance has been irregular since the last review in March 2022. With regards to those organisations, the Director shares the following observations.

4.3 Cefic

Cefic has only attended one meeting in the past three years. However, Cefic's shared interest with the IOPC Funds lies specifically with the 2010 HNS Convention and, as it has confirmed previously, when there is expected to be significant discussion of the 2010 HNS Convention as an agenda item, the organisation endeavours to attend and contribute. Indeed, it was present at the April 2025 sessions of the governing bodies and actively contributed to the 2010 HNS Convention workshop in April 2024. It also collaborated with the Secretariat on the delivery of a short training session at Interspill in June 2022. The recent progress towards entry into force of the 2010 HNS Convention is likely to see increased engagement with the organisation in the future.

4.4 CPMR

At the time of the last review in March 2022, the 1992 Fund Administrative Council, acting on behalf of the 1992 Fund Assembly, instructed the Director to write to CPMR to urge it to attend upcoming meetings of the governing bodies and maintain engagement with the organisation ahead of the 2025 review. CPMR has attended two meetings in the past three years.

4.5 IIDM

IIDM have attended one meeting only, in October 2022, shortly after the last review period. However, it has had some engagement with the Secretariat intersessionally, sharing updates on their activities in promoting the 2010 HNS Convention and inviting representation of the IOPC Funds at its own meetings.

4.6 ISCO

The only organisation which has not attended recent IOPC Funds' meetings is ISCO. However, ISCO and the IOPC Funds continue to share common objectives in promoting effective preparedness, response and cooperation in the event of oil spills. It has recently reconnected with the IOPC Funds Secretariat through the Interspill organising committee, which it joined as an official partner in 2025. It also uses its newsletter, which is widely circulated among the spill response community, to share important updates from the IOPC Funds, such as the promotion of new publications and guidance materials.

4.7 ISU

While ISU has only attended one recent meeting of the IOPC Funds, cooperation between the organisation and the IOPC Funds' Secretariat has continued since the March 2022 review. As recognised at the time of the previous review, ISU comprises a Secretariat of only one or two people, making it difficult for the organisation to participate. The conclusion at the end of the 2022 review was that the Secretariat would maintain a relationship with ISU and encourage it to participate if ever an issue of salvage should arise within meetings of the IOPC Funds' governing bodies.

4.8 IUMI

Although previously IUMI would regularly attend IOPC Funds meetings, it has been represented on only two occasions since the last review in 2022. However, IUMI has engaged intersessionally with the Secretariat. The IOPC Funds partnered with IUMI and numerous others to deliver a workshop in Ireland in October 2025 to provide guidance to EU Member States on best practices in managing incidents involving vessels in need of refuge.

4.9 Director's recommendations

- 4.9.1 The Director is very grateful to all the international non-governmental organisations with observer status for their ongoing support and cooperation.
- 4.9.2 The Director is pleased that the majority of organisations with observer status regularly attend meetings of the IOPC Funds' governing bodies. The Director notes that the Secretariat regularly engages with several of those organisations on a range of matters of mutual interest, in some cases on a weekly basis. As set out in section 3, the Secretariat works with a number of the organisations to deliver presentations for workshops and similar events. With others, there is collaboration on various projects, and with some, they have provided information or shared expertise when requested. In the Director's view, these interactions outside of the meetings are incredibly useful to the IOPC Funds.
- 4.9.3 He notes that the six organisations listed in paragraphs 4.3-4.8 have not attended IOPC Funds' meetings regularly over the past three years. He notes that for some of those organisations, explanations have been provided for low attendance in their letters submitted as part of the review process. The Director recalls that in the past, in such cases, the 1992 Fund Assembly has in the first instance urged regular attendance for the subsequent review period and, if attendance has not improved in that time for a particular organisation, unless there are extenuating circumstances, its observer status has been withdrawn.
- 4.9.4 The Director points out that, since some of the organisations with low attendance over recent years have small Secretariats and/or are located outside of the United Kingdom, in person attendance at meetings has proven difficult. Since the IOPC Funds will be holding meetings in hybrid format from November 2025, the Director believes that this should enable such organisations to more easily find time to attend all or part of the IOPC Funds' meetings remotely. With this in mind, the Director believes that Cefic, CPMR, IIDM, ISCO, ISU and IUMI should be encouraged to attend meetings of the IOPC Funds' governing bodies more regularly, ideally in person, but if that is not possible, to make use of the hybrid facilities now available and attend remotely.
- 4.9.5 Taking into account all the information available, the Director recommends that all international non-governmental organisations which currently hold observer status with the IOPC Funds maintain that status until the next review in 2028.

5 Action to be taken

5.1 1992 Fund Assembly

The 1992 Fund Assembly is invited to:

- (a) establish a group of five States with the mandate to consider the information provided by the Secretariat concerning the relationship between the Funds and the international non-governmental organisations and, taking that information into account, consider whether the continuance of observer status for each organisation is of mutual benefit and report its findings to the governing bodies; and
- (b) decide whether, having taken note of the report of the group of five States, the continuance of observer status for each international non-governmental organisation is of mutual benefit.

5.2 Supplementary Fund Assembly

The Supplementary Fund Assembly is invited to:

- (a) take note of the decisions of the 1992 Fund Assembly; and
- (b) decide whether to divert from the decision of the 1992 Fund Assembly on the continuance of observer status in respect of a particular organisation.

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ANNEX I

GUIDELINES ON RELATIONS BETWEEN THE INTERNATIONAL OIL POLLUTION COMPENSATION FUND 1992 (1992 FUND) AND INTERGOVERNMENTAL ORGANISATIONS AND INTERNATIONAL NON-GOVERNMENTAL ORGANISATIONS

(as amended by the 1992 Fund Administrative Council at its 17th session, acting on behalf of the 1992 Fund Assembly at its 22nd extraordinary session, held from 30 April to 2 May 2018)

A Intergovernmental organisations

- 1 The United Nations and the International Maritime Organization and any other specialised agency of the United Nations whose interests and those of the 1992 Fund are of common concern, will be invited to be represented by observers at all meetings of the Assembly and may be invited, as appropriate, to meetings of subsidiary bodies.
- 2 The Assembly will consider requests to be represented by observers received from other intergovernmental organisations whose aims and activities are relevant to those of the 1992 Fund or which are interested in the work of the 1992 Fund. An invitation to attend a session of the Assembly or other meeting may, subject to confirmation by the Assembly, be issued by the Director to any organisation making such a request. The Assembly may decide that invitations be sent to such an organisation either for a specific session or meeting or on a regular basis.
- 3 An agreement for co-operation may, with the approval of the Assembly, be concluded between the 1992 Fund and any intergovernmental organisation, if it is in their mutual interest to do so. The agreement may provide, where appropriate on a reciprocal basis, for admission as an observer, exchange of information, consideration of suggestions for agenda items, consultation on programmes and joint activities and other practical co-operation.

B International non-governmental organisations

- 1 Observer status may be granted by the Assembly to an international non-governmental organisation, at its request, if:
 - (a) the organisation concerned is of truly international character and its objectives are in harmony with those of the 1992 Fund;
 - (b) it has aims, responsibilities or activities in the fields related to those of the 1992 Fund or which are of concern or interest to the 1992 Fund, particularly in connection with pollution and environmental matters, maritime and shipping affairs, marine insurance, production or transport of oil or relevant questions of international law; and
 - (c) it is able to make a contribution to the work of the 1992 Fund, for example by providing specialised information, advice or expertise, or by identifying or helping to procure the services of experts or consultants, or by otherwise furnishing technical assistance or by making research facilities available.
- 2 The Assembly may decide to seek the advice of a group formed of five Member States, nominated at the opening of a session. The group will examine the request for observer status based, in particular, on the criteria listed in paragraph B.1 and report its findings to the Assembly at that session.

- 3 Observer status may be granted on a provisional basis for a period normally not exceeding three years.
- 4 Observer status will be withdrawn if the Assembly considers that there is no further advantage to the 1992 Fund in continuing with the same or if any conflict of interests arises or is likely to arise between the respective activities of the 1992 Fund and the organisation concerned.
- 5 The Assembly will review every three years the list of international non-governmental organisations having observer status in order to determine whether the continuance of observer status for any particular organisation is of mutual benefit.
- 6 The Assembly may decide to seek the advice of a group formed of five Member States nominated at the opening of a session for the review of organisations having observer status. The group will make an assessment based, in particular, on the criteria listed in paragraph B.1 and report its findings to the Assembly at that session.

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ANNEX II

ATTENDANCE AT MEETINGS OF IOPC FUNDS' GOVERNING BODIES AND SUBMISSION OF DOCUMENTS BY INTERNATIONAL NON-GOVERNMENTAL ORGANISATIONS

Meeting date	Oct 2022	May 2023	Nov 2023	April 2024	Nov 2024	April 2025
Governing bodies	92AC22/ 92A27, 92EC79, SA19	92AC23/ 92AES27, 92EC80, SAES11	92A28, 92EC81, SA20	92AC24/ 92AES28, 92EC82, SAES12	92A29, 92EC83, SA21	92AC25/ 92AES29, 92EC84, SAES13
BIMCO		√	√		√	
Cedre	√	√	√	√	√	√
CMI	√		√	√		√
CPMR		√			√	
CEFIC						√
IIDM	√					
IACS	√	√	√	√	√	√
ICS	√	√	√	√	√	√
Int. Group of P&I Associations	√√	√	√	√	√	√
ISU	√					
ISCO						
IUMI			√	√		
INTERTANKO				√	√	√
ITOPF	√	√	√	√	√	√
OCIMF	√	√	√	√	√	√
Sea Alarm	√		√		√	
WLGA	√	√	√	√	√	√

√ Attended sessions

√√ Attended sessions and submitted document

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RESPONSES BY ORGANISATIONS TO DIRECTOR'S LETTER INVITING COMMENTS ON WHETHER THE CONTINUANCE OF OBSERVER STATUS WAS STILL OF MUTUAL BENEFIT

(ORIGINAL ENGLISH, UNLESS STATED OTHERWISE)

BIMCO

Turning to the subject matter of your letter of 4 July 2025, I would like to assure you that BIMCO greatly values the relationship between our two organisations. I am therefore pleased to confirm BIMCO's wish to continue its observer status with the IOPC Funds.

BIMCO is the largest direct-entry shipping organisation, with 2100 members across 120 countries. Our membership represents 2/3 of the world's cargo fleet, including 55% of the global tanker fleet, measured by tonnage. BIMCO members span all sectors of the industry and include shipowners, operators, managers, brokers, agents, P&I clubs, and other maritime stakeholders.

International uniformity is essential for shipping as a truly global industry. BIMCO's active engagement with a wide range of intergovernmental organisations — including the IOPC Funds, IMO, UNFCCC, the London Convention and Protocol, and UNCITRAL — ensures that industry perspectives are considered when shaping and refining the global maritime regulatory framework.

The deliberations and decisions of the IOPC Funds have important implications for the shipping industry at large. BIMCO's participation in the Funds' meetings allows us to keep our members well informed about developments that may affect their operations.

BIMCO therefore welcomes the opportunity to continue contributing to the work of the IOPC Funds and would very much appreciate the continuation of our observer status. My colleague Carl Lindahl is looking forward to attending the upcoming session scheduled for 4–7 November.

Cedre

ORIGINAL FRENCH

We have received your letter dated 4 July 2025 regarding the procedure for the renewal of observer status for international non-governmental organisations, and we thank you for it.

I confirm once again this year the keen interest of the Centre of Documentation, Research and Experimentation on Accidental Water Pollution (Cedre) in keeping its observer status with the 1992 Fund. Cedre has maintained its scope of action in relation to oil pollution, notably by carrying out research and experimentation on low-sulphur and very low-sulphur fuel oils. Over the past three years, we have intervened in several maritime accidents at the request of the United Nations and the European Commission, in Peru, the Philippines and the Red Sea.

We have also broadened our expertise by leading a correspondence working group at the IMO on industrial plastic pellets, while continuing our work on Hazardous and Noxious Substances. The MAR-ICE Network, a service offered by the European Maritime Safety Agency, for which we act as focal point, has also been extended this year to the Black Sea and southern Mediterranean coastal States.

Given the particular importance we give to our relationship with the IOPC Funds, I plan to attend in person the meeting of the governing bodies during the week of 3 November 2025.

Comité Maritime International (CMI)

I am writing on behalf of our President, Dr Ann Fenech, to thank you for your letter of 4 July 2025, which has been referred to me for response. You have asked specifically for our comments on whether we consider that the continuance of CMI's observer status with the IOPC Funds would continue to be of mutual benefit to CMI and to the 1992 Fund. As stated in past letters in response to similar requests for our views on this issue, the response is a resounding "yes".

CMI has for many years consistently sent high-level delegations to attend the meetings of the governing bodies of the Funds, the core of which have been comprised, since the last review, of Mr Patrick Griggs, CBE, who is a past President of CMI, who attended until 2022, and since then, by Mr Andrew Taylor, Secretary and Treasurer, British Maritime Law Association.

Following each meeting of the Funds' governing bodies, it is CMI practice to prepare a report on the meeting, which is then published in our CMI Newsletter, which is sent to all its constituent National Maritime Law Associations, Titulary Members and Consultative Members. The Newsletters are also posted on the CMI website. These reports are also published in the Journal of International Maritime Law.

As you are no doubt aware, CMI has established several International Working Groups and Standing Committees which undertake research in a variety of areas of interest to the Funds, including Liability for Wrongful Arrest, Liability of Classification Societies, Security Interests over Shipping Containers, Offshore Activities, Ship Nomenclature, Marine Autonomous Surface Ships (MASS), and Piracy and Maritime Violence which was recently expanded to include Fraudulent Activity including Fraudulent Registries.

Another of CMI's Standing Committees is Implementation and Promotion of Maritime Conventions, which, of course, includes the Civil Liability and Fund Conventions; and we have very recently set up a Sub-Committee to this Standing Committee specifically to Promote Ratification of the Main International Conventions by Latin-American Countries.

In relation to MASS, CMI has continued to work closely with the IMO Maritime Safety Committee and the Legal Committee in their analyses and developments of the issues following their regulatory scoping exercise which, as you know, included the various liability and compensation conventions developed under the aegis of the IMO with substantial input by the IOPC Funds.

CMI in conjunction with the Centre for Maritime Law of the National University of Singapore (CML), also maintains a Database of Judicial Decisions on International Conventions, which might be of interest to the Funds and its members. More details may be found on the CMI website.

It goes without saying that CMI also stands ready to assist the IOPC Funds at any stage in the future with any of the above-mentioned issues as well as any other issues within the scope of its work. As already noted in previous correspondence, CMI is able to call upon its network of National Maritime Law Associations, which cover a wide variety of different legal systems and jurisdictions.

In conclusion, the CMI greatly values its relationship with the IOPC Funds and intends to be present at the forthcoming meeting in November 2025 of the 1992 Funds Assembly where the review of international non-government organisations having observer status will take place.

CMI's continued engagement in meetings of the Funds' governing bodies as well as the very welcome presence of yourself at its conferences, colloquia and symposia demonstrates our concern to continue that relationship and to contribute positively to the aims and objectives of the IOPC Funds.

Conference of Peripheral Maritime Regions (CPMR)

ORIGINAL FRENCH

Thank you for your letter of 4 July 2025 regarding the periodic review of non-governmental organisations granted observer status with the 1992 Fund.

The Conference of Peripheral Maritime Regions (CPMR) wishes to confirm its keen interest in maintaining this observer status, which represents for our organisation an important framework for cooperation and dialogue with institutions involved in the prevention of, and compensation for, damage related to marine pollution.

The CPMR undertakes, within its means, to participate in the meetings of the IOPC Funds' governing bodies whenever possible. We recognise the strategic importance of these interactions for the maritime regions we represent, which are often directly affected by the risks and consequences of oil pollution at sea.

In this context, we hope to be able to continue contributing to discussions and enriching the deliberations of the 1992 Fund.

We thank you for the trust you have placed in the CPMR thus far and remain at your disposal for any further information.

Mutual interest of the 1992 Fund and the CPMR in maintaining observer status for the CPMR

The CPMR considers that maintaining its observer status with the 1992 Fund would be of mutual interest to both Organisations. The CPMR has a truly international vocation, bringing together more than 140 regional authorities from 24 countries of the European Union and beyond, and its objectives are consistent with those of the 1992 Fund. Through its extensive network of contacts within European institutions and national governments, the CPMR defends the role and interests of regions as legitimate actors with strong skills and expertise. We confirm our willingness to make our expertise, experience and networks available to contribute to the work of the 1992 Fund, for example by providing information, sharing advice or specific knowledge, calling on regional experts, or providing technical assistance by any other means.

The CPMR intends to continue its activities in areas related to those dealt with by the 1992 Fund, or of interest to the 1992 Fund, particularly with regard to pollution and environmental issues, maritime affairs and traffic, maritime insurance, oil production or transport, or relevant issues of international law, in particular in the area of compensation for environmental damage caused by the discharge of oil at sea.

These elements lead the CPMR to wish to maintain its observer status.

The CPMR will participate in the November 2025 meeting of the IOPC Funds' governing bodies.

European Chemical Industry Council (Cefic)

Thank you for your letter of July 4th 2025 regarding the observer status of Cefic in the 1992 Fund Assembly.

Cefic has a strong interest in the developments regarding the ratification and implementation of the 2010 HNS Convention. Therefore, we are interested in keeping our observer status in the 1992 IOPC Fund Assembly.

Cefic, together with its national associations, has been very active in supporting national authorities in their work towards ratification of the 2010 HNS Convention. We also actively contributed to the discussion on simplification of the process within the 1992 IOPC Fund Assembly. Cefic is willing to continue this engagement with the IOPC Fund Assembly, national authorities, and European Commission to foster ratification and

implementation. Cefic also offers its support in communication and encouraging our members to proactively analyse and collect all information needed.

I would be grateful if you could propose continuation of Cefic's observer status during the next IOPC Fund Assembly.

Ibero-American Institute of Maritime Law (IIDM)

International Association of Classification Societies (IACS)

Thank you for your letter of 4 July 2025 inviting comments on whether IACS considers that its observer status is still to the mutual benefit of our two organisations.

I am pleased to advise that the Association believes in the reciprocal value of maintaining its observer status with the IOPC Funds, and is appreciative of the established relationship and cooperation we share.

We confirm our commitment to the work of the IOPC Funds and continue to stand ready to provide technical advice and input, as requested, on matters being discussed by the IOPC Funds which have relevance to the scope of activities of classification societies, and their role as Recognized Organizations of flag States.

During the latest review period, IACS has participated in all meetings of the IOPC Funds. In order to be able to fulfill the above-stated commitment, IACS continues to make every effort to arrange its own meetings so that they do not conflict with those of the IOPC Funds.

IACS' observer at meetings of the IOPC Funds is the Association's Accredited Representative to the IMO, Mr Konstantin Petrov, and/or his alternate, Mr Matthew Wright (International Liaison Officer).

As stated in our letter of 6 April 2006, when IACS applied for observer status, the Association continues to make a unique contribution to maritime safety and pollution prevention through technical support, compliance verification and research and development. More than 90% of the world's cargo-carrying tonnage is covered by the classification design, construction and through-life compliance Rules and standards set by the twelve members of IACS. Their work, as Recognized Organizations, directly benefits the flag States - IOPC Funds' members. Due to the strong links with the institutions of insurance and protection and indemnity, as well as the supervision of application of high standards of safety and pollution prevention, IACS is woven into the fabric of issues being considered by the IOPC Funds.

We look forward to maintaining our jointly advantageous relationship, and to enjoying the benefits derived from IACS having observer status at the IOPC Funds.

International Chamber of Shipping (ICS)

Your letter requested our comments as to whether the continuance of our observer status remains of mutual benefit to the International Chamber of Shipping (ICS) and the 1992 Fund. As you noted, our organisations have indeed enjoyed a long-standing relationship of cooperation and collaboration and therefore it will be no surprise that I write to confirm that ICS is firmly of the view that the continuance of our observer status would be of mutual benefit.

As you are aware from our submissions to previous reviews of observer status, ICS is a global trade association for shipowners operators and our membership comprises national shipowners' associations representing over 80% of the world merchant fleet, covering all sectors and trades, including tankers. The ICS membership is staunchly supportive of the international regime on civil liability and compensation for pollution damage administered by the 1992 Fund Secretariat. Shipowners' liability under the CLC is an integral part of the overall regime and ICS believes that it is essential that shipowners are represented during the Fund's

deliberations in order to observe the proper functioning of the system and to provide advice on any technical or practical issues that may arise.

ICS participates actively in the work of the 1992 Fund and promotes the regime whenever appropriate. During the three years since the previous review, ICS has attended all meetings of the 1992 Fund Assembly and Executive Committee. The representation has been at a high level, including the Chairman of the ICS Maritime Law Committee and our Principal Director, Legal, among other experts and ICS has frequently intervened at the meetings on matters of interest to the international shipping industry. ICS was also very active during discussions at the IMO Legal Committee to produce Guidance on implementation of IMO Liability Conventions. This matter was raised by interested States following a submission by the IOPC Funds on the problems with inadequate liability insurance encountered in some oil pollution incidents involving insurers who are not members of the International Group of P&I Clubs.

In addition, ICS has contributed its expertise to the Secretariat's work to update the 1992 Fund and Supplementary Fund Claims manuals and to produce a draft HNS Claims Manual. ICS has also taken an active role in recent informal consultations to develop a standard procedure for determining when a ship, which can serve as both an oil tanker under the 1992 CLC and as a chemical tanker under the Bunkers Convention 2001, ceases to be a ship under the 1992 CLC.

ICS has continued its regular contribution to the IOPC Funds' Annual Academy. In addition, two new members of ICS staff participated in the IOPC Funds' Induction Course for observer States and organisations in April 2025.

Finally, ICS has maintained a constructive dialogue with the IOPC Funds' Secretariat and our two organisations have cooperated to explain, protect and promote the 1992 CLC and Fund regime at international events such as Spillcon 2023 (Australia), Interspill 2025 (London) and the 2025 CMI Conference (Tokyo).

We believe that it is evident from the above that ICS continues to fulfil the criteria for observer status with the 1992 Fund as set out in section B1 of the Guidelines enclosed with your letter. ICS greatly values its observer status, which we firmly believe is of mutual benefit to the Fund and the ICS membership and we respectfully request its continuation.

Ibero-American Institute of Maritime Law (IIDM)

In response to your kind letter dated 4 July 2025, addressed to the Executive Secretary General of this Ibero-American Institute of Maritime Law, and in accordance with the powers vested in me under the statutes of the organisation I represent, I hereby respond to the request made in your letter received by email on 4 July 2025.

To this end, I would like to express the interest of the Ibero-American Institute of Maritime Law (IIDM) in continuing as an observer of your distinguished organisation, as we consider it extremely important that the collaboration between both institutions be maintained for the mutual benefit of our members.

To this end, I would like to inform you that the IIDM is made up of individuals from various Latin American countries, such as Mexico, Colombia, Brazil, and Argentina, among others, as well as countries outside Latin America, such as Spain, the United Kingdom, Canada, and the United States of America, which attests to the international nature of our Institute.

Likewise, we would like to inform you that the IIDM has participated in and carried out several activities closely related to the objectives of the 1992 Fund, especially with regard to environmental and pollution issues, maritime and shipping matters, maritime insurance, hydrocarbon production and transport, and matters related to international law, such as participation in Mexico's National Action Plan for the decarbonisation of the maritime sector (Green Voyage 2050 Programme) of the International Maritime Organization, the event entitled "Cargo Claims in International Maritime Transport", organised by the Spanish branch of the IIDM, among many other activities.

The Institute's work in participating in the "Buenos Aires Document SNP-2021" is noteworthy, where members from different countries expressed their opinion on the advisability of ratifying the aforementioned instrument together with Dr Maura and Dr Monsalve.

In this regard, we would like to inform you that the team is being formed to participate in the 1992 Fund Assembly to be held in November 2025, in addition to the fact that several members of this Institute have actively participated in the activities promoted by your distinguished Fund over the past three years.

Finally, I reiterate the IIDM's interest in maintaining its status as an observer of the Fund, not only because of the benefits that this relationship brings to our institutions, but also because of the benefits it may bring in the future to our members and the maritime environment.

International Group of P&I Associations

Thank you for your letter of 4th July 2025 advising us of the upcoming 1992 IOPC Fund Assembly review of NGOs with observer status.

The member Clubs of the International Group remain closely involved in all major issues of general importance that come before the IOPC Funds. The Group Clubs between them currently cover, amongst other liabilities, the pollution liabilities (including oil pollution, whether carried as cargo or as ship's fuel) of approximately 80% of the world oceangoing tanker fleet and approximately 90% of the world merchant fleet. The Group Clubs have for many years been the major providers of the financial guarantees required under the 1992 CLC (as well as under the Bunkers and Wreck Removal Conventions) and are involved in the majority of ship sourced pollution incidents occurring worldwide.

The vast majority of 1992 CLC, and 1992 CLC/IOPC Fund, cases involve a vessel entered for P&I cover with one of the member Clubs of the International Group. In this context the Group Clubs work closely and collaboratively with the IOPC Funds in relation to individual claims arising. Reference is made in this regard to the Memorandum of Understanding (MoU) between the International Group and the 1992 IOPC Fund.

Apart from specific claims involvement the Group is continuing to work with the Funds in relation to important issues on the Fund's agenda and has participated and will continue to participate in the processes for implementation of the HNS Convention. The Group also has an ongoing liaison with the Funds and ITOPI with regard to outreach and provides periodical updates to the Funds in relation to STOPIA vessel numbers. In addition, in 2026 the Group will conduct a review of STOPIA and TOPIA. The Group also coordinates with the Funds in relation to the Funds annual short course arranging for visits with Group Clubs and the Group Secretariat.

The Group Clubs consider that it is of mutual importance to renew their observer status with the 1992 IOPC Fund for a further three years.

International Spill Control Organization (ISCO)

I am writing concerning the November 2025 periodic review of the observer delegation, specifically addressing the International Spill Control Organisation's observer status with the IOPC Funds.

The International Spill Control Organization expresses its intent to maintain and renew its engagement with the IOPC Funds.

The organisation recognises that its attendance and direct engagement at IOPC Funds meetings have been limited in recent years, and the topics discussed were not areas where it could make substantial contributions, although reporting via its newsletter and support, and dissemination have continued.

ISCO has experienced significant organisational changes, particularly during the COVID-19 pandemic and subsequent recovery. The death of ISCO's founder/chairman and sole shareholder, David Usher, in 2022, along with the loss of other key members and increased early retirements or reduced volunteer availability, restricted outreach activities.

In 2024, ISCO conducted an internal review of its future plans, objectives, corporate governance, and priorities. This led to the implementation of a new structure and organisational model. Notable changes included rotation of board and council members and updates to electronic communication tools for weekly news—improving compatibility with phones—and enhanced access to external information sources. Additional forums were established to facilitate member communication and working groups supporting key outreach efforts.

ISCO's mission and objectives remain focused on knowledge sharing, aligning with those of the 1992 Fund in pollution and environmental issues, maritime and shipping affairs, marine insurance, oil transport, and aspects of international law as applied to national legislation.

Membership is open internationally to individuals and organisations interested in spill response and the dissemination of knowledge. Current members include response companies, salvors, specialist equipment manufacturers, research institutes, ports, training providers, and local environmental groups.

ISCO operates as a not-for-profit entity funded by membership fees; all board and council members are unpaid volunteers. The board and council represent multiple countries, including the UK, China, USA, Canada, South Africa, Australia, Brazil, Panama, and Turkey, providing a global perspective on international and national matters, and supporting local outreach work.

Funds raised by ISCO are used solely to advance its stated objectives. These are primarily achieved through the website, weekly newsletter, sponsorship of emerging leaders and students, educational programs, conferences, and networking events. ISCO contributes to major international oil spill conferences and various regional and local events, meetings, and forums.

The organisation continues to endorse the IOPC Funds' objectives, aiming to contribute knowledge from front-line incident response to the IOPC Funds and its member state delegations. New options for remote participation introduced by the IOPC Funds will help facilitate broader involvement within existing financial constraints.

Additionally, ISCO collaborates with governmental bodies on claims and compensation processes, aiming to improve these systems and share lessons from a wide range of non-tanker marine incidents. While current IOPC Funds guidance documents are based on experience in managing a cluster of high-profile cases (such as *Prestige*, *Erika*, and *Hebei Spirit*), ISCO's members draw insights from varied, less well-known incidents. These experiences may inform ongoing improvements to compensation management and preparing for future incidents, including HNS events.

ISCO has previously managed claims and compensation costs involving its members, contributing to a reduction in the overall number and scale of claims. For example, ISCO developed RESPONSECON, an industry-standard template for rapid spill response contracting, in collaboration with BIMCO, the International Group of P&I Clubs, and the International Salvage Union. ISCO provides the contract via BIMCO at no cost to enhance the timing of response operations. It was introduced at meetings held by the IOPC Funds and the IMO. There are suggestions to broaden RESPONSECON to address emerging topics, such as new fuel types, hazardous substances, and nuclear-related concerns.

In conclusion, ISCO desires to maintain observer status and participate actively, including submitting relevant papers and documents, and support its observer role at the discretion of the IOPC Funds and Member States.

International Salvage Union (ISU)

The International Salvage Union (ISU) firmly believes that it is of mutual benefit that we should continue to have observer status.

Considering your guidelines relating to NGOs, I should report that in relation to the Guidelines' 1 (a) the ISU is truly international in its outlook. We represent members from every continent and we ensure that our Executive Committee has representatives from a variety of territories around the world. At present our committee includes executives from Japan, Chile, Argentina and Australia as well as the United States and Europe. Our immediate past president was from South Africa, our current president is from the USA and our next President is from the Netherlands.

Further to 1 (a) our objectives are aligned not least because our members are often the only organisations available to provide services that prevent or minimise pollution and harm to the environment from marine casualties. The primary object of the ISU as stated in the Articles of Association is:

To promote the saving of life and salvage of property in danger at sea and, whilst so doing, to prevent or minimise damage to the environment.

Considering the Guidelines' 1 (b) the ISU Articles also state that our association should promote:

The prevention or minimisation of damage to the environment during the conduct of marine salvage operations; and co-operation, communication, collaboration and good commercial relations between persons, associations and bodies working within the marine salvage industry, shipping companies, marine insurers, and in particular, the Members of the Union.

The ISU annual Pollution Prevention Survey is the best way to demonstrate the environmental benefit provided by our industry. In 2024 (latest figures) the results showed that ISU members provided services to vessels carrying 2.4 million tonnes of potentially polluting cargo. This included 400 000 tonnes of crude oil and 17 cases where the casualty had more than 1 500 tonnes of bunkers aboard.

Considering the Guidelines' 1 (c) the ISU stands ready to provide support, information, advice and expertise as required or requested by the IOPC Funds in the course of its important work. For example, it might be valuable to explore ways together to widen understanding of the importance of the commercial salvage industry as evidenced by our pollution prevention survey.

As you generously acknowledged in your letter we are a small trade association with limited resources but we hope to be influential on important matters and we are the only voice of the global salvage industry.

I expect to be present for the review and to participate in the meeting of the governing bodies in early November either in person or remotely as you note. I give my personal commitment to improving our connection and participation with IOPC Funds.

Thank you in advance of your consideration of our continued status as an international non-governmental organization with observer status at IOPC Funds.

International Union of Marine Insurance (IUMI)

Thank you for your letter regarding the upcoming review of organizations holding observer status with the IOPC Funds. IUMI remains fully committed to attending IOPC meetings and participating as an observer organization.

IUMI is the global umbrella organization for marine property insurers, representing sectors such as Hull & Machinery, Cargo, and Offshore Energy insurance. Our membership comprises 42 national marine insurance associations from around the world. The marine insurers and reinsurers represented by these associations include some of the largest and most wellcapitalized insurance companies globally. Among the diverse insurance products offered by our members is marine liability insurance, which encompasses pollution liability coverage, both as direct insurance and reinsurance.

Many of our members participate in the reinsurance programme purchased annually by the International Group of P&I Associations (IG). This programme enables the individual Group Clubs to provide up to US\$1 billion in insurance cover for oil pollution damage, including liabilities under the 1992 Civil Liability Convention (CLC) and the 1992 Fund Convention.

In addition, our members provide insurance cover for the non-poolable liabilities of individual Group Clubs, for pollution liabilities associated with the offshore energy sector, for brown watercraft globally, and for incidents involving sub-sea structures and pipelines. This alignment with the mission and objectives of the IOPC Funds underscores the mutual benefit of IUMI continuing in its role as an observer organization.

An example of our engagement with IOPC Funds concerns oil pollution incidents involving insurers outside the IG. IUMI has contributed to discussions with IOPC Funds Member States, the IMO, and the IG to address challenges arising from non-IG insurers.

Moreover, IUMI's Legal & Liability Committee has a strong interest in pollution issues, it is hence important to stay abreast of incidents involving IOPC.

Looking ahead, we intend to participate in future IOPC meetings when agenda items are of relevance to our members. Over recent years, Neil Roberts, Head of Marine & Aviation at Lloyd's Market Association and Chair of IUMI's Policy Forum has attended IOPC meetings and provided input as appropriate.

We look forward to learning whether the 1992 Fund Assembly will favourably consider our request to continue IUMI's observer status.

INTERTANKO

We write in relation to the review that the 1992 Fund Assembly is currently carrying out of international non-governmental organisations having observer status.

As you will be aware, INTERTANKO is the International Association of Independent Tanker Owners and represents over 180 oil, chemical and gas tanker owners with a combined fleet of approximately 4,000 tankers with over 355 million dwt. INTERTANKO's associate membership stands at 220 companies and organisations with interests in oil, gas and chemical shipping by sea.

INTERTANKO has long taken an active interest in the work of the International Oil Pollution Compensation Fund and we respectfully request the continuation of our consultative status.

We believe that INTERTANKO's objectives are in harmony with those of the 1992 Fund and aligned with the Guidelines on relations between the 1992 Fund and international non-governmental organisations and the Fund's requirements for observer status.

This alignment is reflected in INTERTANKO's Articles of Association, which set out our aims as follows:

Extract from INTERTANKO's Articles of Association:

2) Aims

The Association is a non-profit organisation whose aims are to further the interests of independent tanker owners; to promote a free and competitive tanker market; to work for safety at sea and the protection of the marine environment.

The scope and objects shall be:

- *to promote internationally the interests of its members in matters of general policy;*
- *to co-operate with other technical, industrial or commercial and environmental interests or bodies on problems of mutual concern to its members and to such interests;*
- *to take part in the deliberations of other international bodies so far as may be necessary for the attainment of its objects;*
- *to do all things conducive to the attainment of the above objects or any of them.*

Moreover, INTERTANKO's contributions to the work of the Fund – through regular participation in meetings, involvement in the IOPC Funds' Annual Academy, and active promotion of international oil pollution compensation conventions – have, we trust, been both constructive and valuable over the years.

We hope this demonstrates our continued alignment with the objectives of the Fund and satisfies the criteria for observer status. We would, of course, welcome any feedback on how our engagement could be further strengthened.

ITOPF

I am pleased to confirm that I consider there to be continued mutual benefit to ITOPF and to the IOPC Funds for ITOPF to maintain this status. Accordingly, I attach an update of our previous supporting comments for consideration by the 1992 Fund Assembly. We expect to be able to attend the meeting and look forward to participating.

I, and my colleagues at ITOPF, look forward to continuing the excellent longstanding relationship between our two organisations.

Updated Comments from ITOPF

I consider ITOPF meets fully the criteria set out in paragraph B.1 of the Guidelines enclosed with your letter of July 2025. I would submit that we attend regularly all meetings of the 1992 Fund governing bodies, including the Assembly, Executive Committee and Working Groups. ITOPF has had a direct involvement in the majority of incidents involving the IOPC Funds, and has contributed to the work of the Funds in many other ways since 1978. I look forward to continuing this valuable relationship into the future and trust therefore that the Assembly at its November 2025 session will agree to the continuance of our observer status.

The core values of ITOPF are central to our work and to the strong bond we have with the IOPC Funds:

Collaboration – inspiring teamwork and cooperation to achieve the goal of effective spill response.

Integrity – engendering trust in our work through honesty and scientific principles.

Objectivity – providing unbiased, consistent advice to all who seek it.

Respect – empowering a friendly, supportive culture that values diversity and the abilities and experience of all.

Diligence – delivering our services to the highest standards of excellence, with skill and good judgment.

ITOPF's International Character

To address the requirement specified in paragraph B.1(a) of the Guidelines, I will highlight that ITOPF's Membership comprises the majority of the world's commercial tanker owners. The owners of many other types of ship are eligible to become Associates of ITOPF. In both cases the annual subscriptions are paid to ITOPF by the ship's third party P&I liability insurers on behalf of their members.

ITOPF is a technical body offering impartial advice on many aspects of pollution response, on pollution damage and on claims assessment globally. To this end, ITOPF has attended on site at pollution incidents in 100 countries, and has provided advice remotely for incidents in many additional countries.

The Board of Directors of ITOPF comprises individuals from ship-owning and operating companies globally, as well as representatives of P&I Clubs that participate in the International Group of P&I Clubs.

I should emphasise that ITOPF is not involved in any lobbying on behalf of any particular interest.

Response to spills

The priority service of ITOPF is attending on-site at ship-source spills of oil, chemicals and other substances carried as cargo and/or bunker fuel around the world, at the request of shipowners, their third party liability insurers and the IOPC Funds. The primary purpose of our attendance is to promote and encourage effective clean-up and the mitigation of damage to the environment, economic resources and affected communities through the provision of objective technical advice. When the incident involves a ship, as defined in the 1992 Civil Liability and Fund Conventions, that is spilling or threatening to spill persistent oil affecting a Contracting State to the Fund Convention, ITOPF can be the organisation that first informs the Funds of the incident.

Under the terms of an agreement signed between the IOPC Funds and ITOPF in 2014, and revised most recently in 2023, the Funds are able to call on the services of ITOPF as a recognised expert to assist with the provision of technical advice. This advice may comprise information and assistance to government agencies and other parties affected by oil, reporting on the incident to the IOPC Funds' Secretariat and the assessment of claims for clean-up operations and pollution damage as a result of an incident in Contracting States. Upon

the entry into force of the HNS Convention, a similar arrangement will be possible for relevant incidents.

When on-site at a pollution incident the ITOPF adviser(s) will actively encourage adherence to the claims admissibility criteria contained in the 1992 Funds' Claims Manual and associated Guidelines. ITOPF situation reports are sent routinely from the field to various parties, including the IOPC Funds, with particular issues highlighted and discussed as they arise.

Damage assessment and analysis of claims

Assessing the damage caused by oil to economic activities, primarily to fisheries & tourism, and/or to the environment is a part of ITOPF's role in pollution incidents. Assessment reports will be sent to the Funds' Secretariat, and other parties as appropriate, to maintain the flow of information, to highlight areas of potential concern and to guide corresponding actions as deemed necessary in the circumstances. The role of ITOPF in environmental damage includes assistance with post-spill studies and to consider the feasibility of reasonable restoration measures. I anticipate the involvement of ITOPF in such issues for the Funds will continue in the years ahead.

Claims for costs and losses as a result of a pollution incident are reviewed regularly by ITOPF in relation to observations made on site at the time of the response, taking account of the Funds' own claims admissibility criteria. ITOPF staff can utilise extensive in-house knowledge of the rates charged by various public and private entities globally as a basis for comment on the reasonability of claimed costs. ITOPF has been requested by the Funds' secretariat on many occasions to review claims for fisheries, tourism and other losses arising from pollution damage. Once the assessment of a claim is completed a detailed report is passed to the Secretariat, and to the casualty's insurer if appropriate, to assist with the settlement process. In major cases, ITOPF's involvement in the assessment of claims for clean-up costs and pollution damage on behalf of the Funds can necessitate many years of work.

In the last decade, ITOPF has provided technical advice for seven incidents involving the payment of compensation by the IOPC Funds: *Agia Zoni II* (Greece, 2017); *Bow Jubail* (Netherlands, 2018); Incident in Israel (2021); *Princess Empress* (Philippines, 2023); *Gulfstream* (Tobago, 2024); *Marine Honour* (Singapore, 2024) and *Terranova* (Philippines, 2024).

Participation in IOPC Funds' Working Groups

ITOPF has a long history of positive contributions to the IOPC Funds' Working Groups. In 1994, for example, ITOPF produced three detailed papers for the Seventh Intersessional Working Group of the 1971 Fund on Preventive Measures, Economic Loss and Environmental Damage. These papers put forward constructive proposals for claims admissibility guidelines, many of which were subsequently adopted by the Fund Assembly for incorporation in the organisation's Claims Manual. ITOPF also played a major role in re-drafting the 1992 Fund's policy on Environmental Damage, in conjunction with various national delegations. ITOPF has submitted papers and contributed to discussion at the 1992 Funds' 6th Intersessional Working Group meetings considering large numbers of claims for small amounts and on the subsequent document Guidance for Member States.

Other work

Examples of other collaborative projects between ITOPF and the IOPC Funds in the recent three-year period since the last observer status review include: the work undertaken.

Presentation to attendees at each of the IOPC Funds' Annual Academies, formerly the IOPC Funds' Short

Course

Participation in training seminars and workshops with the IOPC Funds, including in Singapore (2022), Peru (2023), Japan (2023), Philippines (2023), India (2024), Malaysia (2024), Ecuador (2024) and Slovenia (2025).

ITOPF is an active participant in the drafting group considering text for the Claims Manual applicable to the HNS Convention. ITOPF staff presented on HNS topics at the HNS Convention workshop at the IMO in 2023.

More distantly, ITOPF has contributed to the production of IOPC Funds' documents on a number of subjects, for example by drafting the Fund Guidelines for the Management of Fisheries Closures and Restrictions Following an Oil Spill, and providing constructive comments and suggestions for the Guidelines for Presenting Claims for Clean Up and Preventive Measures and on Environmental Damage Claims.

Attendance at Meetings

One or more members of ITOPF's staff attend meetings of the Executive Committee and Assembly of the IOPC Funds' governing bodies. It is very rare that there is not at least one ITOPF representative in the meeting room. ITOPF's assistance can be requested for review of papers related to particular spills.

By attending these meetings, ITOPF staff are able to understand more clearly the issues arising from incidents in which ITOPF is involved, and the feedback from Member States on papers, guidelines and other collaborative publications through attendance at the meetings.

I hope that you agree that the above summary demonstrates that ITOPF meets the criteria fully, as set out in paragraph B.1 of the Guidelines enclosed with your letter. I therefore trust that the Assembly at its November 2025 session will agree to the continuance of our observer status.

Oil Companies International Marine Forum (OCIMF)

Thank you for your letter of 4 July 2025 in relation to the upcoming review of those organisations holding Observer status at IOPC Funds. OCIMF would very much like to continue its strong relationship with IOPC Funds by maintaining its Observer status.

As you know OCIMF represents a broad spectrum of national, international and specialist energy companies on matters of safety and environmental protection. Our mission is to lead the global marine industry in the promotion of safe and environmentally responsible transportation of crude oil, oil products, petrochemicals and gas. The OCIMF mission and objectives continue to complement those of the IOPC Funds.

OCIMF currently has 111 members. A list of our Members is attached. It is our Members' payments, collected through the oil reporting and the contributions mechanism, which supports the IOPC Funds and its compensation regime. OCIMF and its Members recognise the important role that the IOPC Funds and its Member States play in ensuring that the victims of oil spills incidents are compensated through careful application of the relevant Conventions and good governance.

OCIMF seeks to support the work of the IOPC Funds with the provision of the expertise that it is able to draw upon from its Members. OCIMF has maintained its close involvement with regular attendance at the IOPC Fund meetings since 1978 and has contributed to the development of STOPIA, TOPIA, the reform of the Supplementary Fund and the development of the HNS Convention and associated Protocols. OCIMF is the only Observer delegation that represents the oil receivers who fund the second tier of the compensation regime.

It is OCIMF's strong desire to retain our Observer status to the IOPC Funds, which we consider is mutually beneficial to our respective organisations.

LIST OF MEMBERS (111 companies worldwide as of September 2025)

1	Abu Dhabi National Oil Company (ADNOC)
2	Addax Oryx Group
3	Aker BP ASA
4	Alma Petroli
5	Ampol Shipping & Logistics Pte Ltd
6	Angola LNG
7	Aramco
8	Atem's Distribuidora de Petroleo SA (ATEM)
9	Azule Energy
10	BASF SE
11	Borealis GmbH
12	BP Shipping Limited
13	Braskem SA
14	Cargill Ocean Transportation
15	Cenovus Energy Inc
16	Centrica PLC
17	Cheniere Energy Inc
18	Chevron Shipping Company LLC
19	Circle K Trading SA
20	CITGO
21	CNOOC
22	Compagnie de Distribution des Hydrocarbures (LyondelBasell)
23	ConocoPhillips
24	Dana Petroleum Ltd
25	Ecopetrol S.A.
26	Emirates National Oil Company (ENOC)
27	Empresa Nacional del Petroleos (ENAP)
28	Enel Trade SpA
29	Energy Transfer Partners LP
30	Eni SpA
31	EP Petroecuador
32	Equinor ASA
33	Essar Oil UK
34	Excelerate Energy LLC
35	Harbour Energy
36	Hellenic Petroleum R.S.S.O.P.P. S.A.

37	Hengyuan Refining Company (HRC)
38	Hess Corporation
39	HF Sinclair Corporation
40	INEOS Europe AG
41	INPEX Corporation
42	International Energy Co. Ltd. (was Bakri)
43	International Marine Transportation Limited (IMT)
44	Ipiranga Produtos de Petróleo S.A
45	IPLOM SPA
46	Irving Oil Ltd
47	Italiana Petroli S.p.A
48	Ithaca Energy
49	KMG International NV
50	Koch Shipping PTE Ltd
51	Kuwait Oil Company
52	LUKOIL Oil Company (currently suspended)
53	Mabanaft GmbH & Co. KG
54	Marathon Oil Company
55	Marathon Petroleum Co. LP
56	Martin Midstream Partners
57	Maxcom Petroli SpA
58	Medco E&P Natuna Ltd
59	MISC Maritime Services SDN.Bhd. (MMS)
60	Moeve Trading S.A.U.
61	Motor Oil (Hellas) Corinth Refineries SA
62	Naturgy Energy Group S.A
63	Nayara Energy (currently suspended)
64	Neste Corporation
65	Nigeria LNG Limited
66	Nigerian National Petroleum Corporation
67	Occidental Energy Marketing Inc
68	OLT Offshore LNG Toscana SpA
69	OMV Refining & Marketing GmbH
70	Pampa Energia SA
71	Pan American Energy LLC SUC ARG
72	Pertamina
73	Petrobras
74	PetroChina International Co Ltd
75	Petróleos de Portugal – PETROGAL, SA
76	Petroleos Mexicanos (PEMEX)

77	Petroleum Industry Marine Association of Japan *
78	Petroleum Industry Marine Association of Japan *
79	Petron Corporation
80	Petroperu SA
81	Petrovietnam
82	Phillips 66 Company
83	Pluspetrol Peru Corporation SA
84	Preem AB
85	Primorsk Oil Terminal
86	PTT Public Limited Company
87	QatarEnergy
88	Raízen SA
89	Reliance Industries Limited
90	Repsol
91	Santos WA Energy Ltd
92	SARAS SpA
93	Shell International Trading and Shipping Company Limited
94	Singapore LNG Corporation Pte Ltd
95	Sinochem Oil Co. Ltd (PRC)
96	Sonangol USA
97	Suncor Energy Inc
98	TotalEnergies
99	Tullow Oil Plc
100	Unipet
101	Valero Marketing & Supply Co
102	Valor International Holding FZC
103	Vast Infraestrutura
104	Venture Global LNG
105	Vermillion Energy Resources
106	Vibra Energia
107	Viva Energy Australia Ltd
108	Vivo Energy
109	Woodside Energy Ltd
110	World Fuel Services Corporation
111	YPF S.A

*The Petroleum Industry Marine Association of Japan (PIMA) is counted as two OCIMF Members: ENEOS Corporation and Idemitsu Kosan Co., Ltd (note JXTG Nippon Oil & Energy renamed to ENEOS Corporation June 2020).	
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Sea Alarm Foundation (Sea Alarm)

Thank you for your letter dated 4th July, where you indicate that a review of the observer status of international non-governmental organisations to the IOPC Funds, is coming up in November 2025.

In relation to the upcoming review, Sea Alarm would be very pleased to continue our observer status with the IOPC Funds. In the last three years, although the risk of oil spills has continued to decrease, the high impacts they can have on marine wildlife are still a constant concern. As we expressed in our original application letter in 2017, there is an obvious mutual benefit for both organisations in continuing to work together.

Sea Alarm remains available to provide our oiled wildlife preparedness and response expertise to discussions that may arise in or between meetings of Contracting Parties, and to connect the Contracting Parties and Funds staff with European and global expert networks of wildlife responders. We continue to progress our mission at an international level with authorities in multiple countries and the main regional agreements in Europe, including the Helsinki Convention, the Barcelona Convention and the Bonn Agreement.

We are also closely following trends in how maritime transport risks are starting to change considerably due to processes related to the energy transition and climate change. We are broadening our focus to explore tools and concepts for multiple stakeholders to be prepared to deal jointly with scenarios involving new products and new alternative fuels. Given the upcoming adoption of the HNS Convention, we are in the process of sharing this approach with a group of European authorities and the European Regional Agreements. This aligns well the IOPC Funds mission for authorities to better understand the technical and financial implications of HNS incident response.

We thank you for your support and also sincerely hope to continue our collaboration for many years into the future.

World LPG Association (WLGA)

Thank you for your letter dated 4th July 2025 concerning the next review of observer status of international non-governmental organisations to the 1992 Fund Assembly.

The WLGA has been represented regularly by Mr David Tyler, and representatives of our Japanese Association, at meetings of the IOPC Funds' governing bodies since being granted observer status in 2009.

We agree with your comment that the relationship and cooperation between our organisations will only increase in importance as we move closer towards the entry into force of the 2010 HNS Convention.

We would like to confirm we seek continuance of the WLGA position as an observer and that we will be at the meetings of the governing bodies planned for the week of 3rd November 2025.

We attach an updated response in support of this request below.

We hope your review of our position in November 2025 will conclude that we can continue as an observer organisation.

Updated Comments from the WLGA

The WLGA is a not-for-profit association whose principle activity is to provide information on the Liquefied Gases business - including Liquefied Petroleum Gas (LPG) - to represent its member companies globally and to provide reports on the industry.

The WLGA has an extensive membership of over 300 organisations stretching from producer companies in the Middle East and North America through to supply, distribution, equipment and marketing organisations, based all over the world.

Through partnerships with the United Nations Development Programme, The United Nations High Commission for Refugees, the World Bank, the International Energy Agency, and others, the WLGA and its members strive to promote the use of LPG, and other Liquid Gases, worldwide to foster a safer, cleaner, healthier and more prosperous world.

The same properties that make LPG such a versatile energy source also present challenges in its storage, handling, distribution and use. LPG is an inflammable substance with unique properties, and strict standards and codes of practice are applied to ensure it retains its very good safety record. Over 360 million tonnes of LPG are used around the world every year, in hundreds of applications, and this figure continues to grow. We estimate nearly 3 billion people globally use LPG in one form or another.

We continue to witness the increasing use of LPG as a marine bunker fuel to reduce emissions from ocean going vessels.

The WLGA is keen to be engaged in any discussions that have an impact on the LPG business, and we have followed with keen interest the developments relating to the HNS Convention and note its impending ratification. It is for this reason that the WLGA continues to seek observer status to represent the International LPG industry on issues relating to the product within the HNS Convention in order that they are conveyed clearly.

We have an experienced resource pool that can participate and contribute to discussions or questions that arise about LPG. The WLGA has been represented regularly by David Tyler and representatives from our Japanese LPG Association at meetings of the IOPC Funds' governing bodies since being granted observer status in 2009, and we would like to confirm we seek continuance of the WLGA position as an observer.

We hope your review of our position in November 2025 will conclude that we can continue as an observer organization.

We look forward to attending the meetings of the 1992 Fund Assembly during the week of Monday 3rd November 2025.