



**CLIENT ADVISORY LETTER 2010-07**  
**December 11, 2011**

**RE: International Group issues new guidance on China Pollution Rule**

Dear Client,

We write to follow up on our recent Client Advisory Letter 2011-06 regarding the upcoming China Oil Pollution Regulations. Members of the International Group of P&I Clubs (IG) have been circulating further guidance and updates on the new China Oil Pollution Regulations. The guidance particularly relates to ship pollution response organizations (SPROs) and the regulations' implementation date of 1 January 2012.

A summary of the advice being issued is as follows:

- The IG understands that the 1 January 2012 deadline to contract with an approved spill response contractor will still be enforced
- A partial list of approved SPROs is available – see [Annex I](#)
- An IG-recommended contract for SPROs, including supplemental clauses – [Annex II](#)
- A recommended authorization letter for appointing agents in China to sign the contract with SPROs on a Member's behalf – [Annex III](#)
- An SPRO appropriate to ship type and size must be contracted. A guide to levels of SPRO is given in [Annex IV](#)

Charges proposed by SPROs vary widely and may be high compared to US rates, but as previously noted, US based OSRO fees are extremely cost effective having actually decreased in price since their origination in 1993.

For further information or assistance, we recommend consulting your P&I Club.

Source: [UK P&I Club](#)

Sincerely,

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President

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