



INTERTANKO



Covid-19 Tanker Recovery Management Plan

TWENTY 20



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Introduction

The rapid spread of Covid-19 has had a significant impact on the shipping industry. With major lockdowns and travel restrictions in countries around the world, owners and operators face issues ranging from crew changes to the renewal of statutory certification in their day-to-day operation of their vessels.

This guidance aims to highlight areas that will need urgent attention in order for tankers to return to their normal operating parameters. The document should also assist with demonstrating to charterers and Port State Control that the ship has a plan that covers how it will be brought back in compliance with the requirements.

When arranging audits and inspections, due regard should be given to the INTERTANKO Outbreak Management Plan, particularly social distancing and use of Personal Protective Equipment (PPE) and the joint Oil Companies International Marine Forum (OCIMF), Chemical Distribution Institute (CDI) and INTERTANKO guidance: 'Temporary Covid-19 precautions during an Inspection'.

Whilst this guidance is directed at the ship, attention should also be given to offices, as many will have been closed. Careful consideration should also be given to the differing regulatory regimes which may prevent full operation of shore offices for some time.

1. Certification of Seafarers

In Circular Letter No.4204-Add.5, the International Maritime Organization (IMO) encouraged Flag States to take a pragmatic and practical approach to the extension of the following certificates and endorsements:

- Revalidation of training certificates of seafarers, including medical certificates.
- Issuance of endorsements attesting recognition of certificates in accordance with the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, as amended.

The actions taken worldwide as a result of the outbreak pose a serious challenge for Administrations to continue to allow the training of seafarers, revalidation of certificates (including medical certificates) and endorsements, in accordance with the STCW Convention 1978, as amended. In light of this, the IMO has provided guidance relating to the certification of seafarers, as set out below:

Issuing Administrations are encouraged to take a pragmatic and practical approach concerning the extension of certificates, including medical certificates, and endorsements, as strictly necessary, in accordance with the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, as amended; and to notify ships, seafarers and relevant Administrations accordingly.

Circular Letter No.4204-Add.5 also encourage Port State Control authorities to take a pragmatic and practical approach in relation to the extension of these certificates and endorsements, and their acceptance in the exercise of control procedures in accordance with article X (Control) and regulation I/4 (Control procedures) of the STCW Convention 1978, as amended.

Ship owners/ operators are encouraged to be aware and take into account the various Ports State interpretations concerning the MLC 2006, as restrictions of rectification prior to a vessel's departure may apply. As a reference, particular attention is to be paid to the Australian Maritime Safety Agency (AMSA) which has interpreted MLC 2006 Standard A2.4 in conjunction with Standard A2.5 to mean that seafarers should serve no more than 11 months continuously on board. To that extent, vessels arriving in Australia with seafarers on board who have served more than 11 months but no more than 13 months - with the consent of the seafarer and in accordance with the Flag State requirement - will be required by AMSA inspectors to rectify this deficiency at the earliest opportunity. If any seafarer has served more than 13 consecutive months on board, AMSA will not allow the vessel to sail until the deficiency is rectified.

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- a) The ship owner/ operator should ensure a valid Seafarers' Employment Agreement (SEA) is provided to seafarers whose contracts were extended due to the Covid-19 pandemic and must remain in agreement until repatriation. The SEA must be extended, or a new one issued according to the relevant Flag State dispensation and international regulation. The ship owner/ operator needs to ensure that the seafarer is sent home at the first available opportunity. Evidence should be retained by both the seafarer and the company demonstrating the reason why the seafarer was asked to extend their contract and the SEA.
- b) The ship owner/ operator should be in contact with their financial security provider to confirm that insurance or other financial security is in place for additional costs. Under the Maritime Labour Convention (MLC) provisions relating to repatriation and medical care, the ship owner remains liable for costs pending repatriation (e.g. isolation), medical care, and any costs or expense of crew transfer for suspected cases.

- c) The ship owner/ operator should try to arrange completion of the training requirements whilst their seafarers are on leave (if possible with many colleges closed) and validation of certification, as required prior to their next assignment. With proper planning, the interim certifications, revalidation, and dispensation of seafarer certification can be staggered over a planned period of time. Where this is not possible, the Flag Administration should be consulted.
- d) Similarly, other certification such as Medical certification, Certificate of Competency, Certificate of Recognition and others required under the STCW Convention 1978, as amended, should be updated and/ or renewed accordingly. Care should also be taken of passport and visa validity.
- e) The recovery phase for crew changes is to include precautionary measures for both the joining crew and the existing crew on board. It is recommended that a plan be developed which may include guidance on general travel precautions, isolation periods before embarkation, as well as a transition period on board. Testing for Covid-19 prior to or upon embarkation may also be considered.

2. Seafarers' Wellbeing

During these unprecedented times when seafarers are forced to extend their contracts due to State-imposed pandemic restrictions with their families back home in isolation, unpleasant thoughts and feelings can build quickly. Such emotional strain can make it difficult for those on board to follow daily routines and concentrate on work tasks. If people do not have the opportunity to process these thoughts and feelings or they are left undetected, they can become overwhelming. Without good coping strategies the risk of depression increases.

- a) The ship owner/operator should develop plans to provide practical guidance to the on-board leadership team on how to manage crew onboard, who might be experiencing stress and anxiety.
- b) A debrief may be conducted with disembarking crew to check on their mental wellbeing and provide listening ears for possible grievances as well as feedback on how pandemic-related issues could be addressed on board, from the crew's point of view. A similar session could be conducted for the crew that stays onboard, at an opportune time.
- c) The ship owner/ operator, may consider developing a strategy to support seafarers who have not been able to join a ship for a long period due to travel restrictions and for those who have contracted Covid-19 while on leave. There may be cases where crew and junior officers / cadets have had training courses ashore cancelled or delayed due to the pandemic and as a result cannot take the next assignment and may need assistance. By supporting the seafarers who are ashore, companies retain their pool of experienced seafarers.
- d) The ship owner/ operator may also offer a mental health support line to crewmembers and provide guidance on mental health initiatives while on board (information and initiatives are available from a range of services including ISWAN's (International Seafarers' Welfare and Assistance Network's) SeafarerHelp 24-hour helpline, the Apostleship of the Sea, Mission to Seafarers, Sailors Society or the non-denominational Partners in Safety Resilience programme "Take Care of Yourself").

3. Crew Change

The ability to undertake contracted crew changes during the pandemic has proven difficult. Without crew changes the cumulative effects of fatigue will adversely impact the physical health of seafarers on board. Similarly, as time progresses where seafarers are unable to leave ships, there will be an effect upon their mental health and general wellbeing. Seafarers working in a state of compromised physical and mental health can prove to be detrimental to the safety performance of the ship.

Key Worker Status

Supported by intense pressure from industry, the IMO, working with the International Labour Organisation (ILO) and the World Health Organization (WHO) has issued guidance outlining seafarers' importance to the world's economy and how they should be designated a special status as key workers. Through this status, seafarers should have appropriate exemptions from national travel or movement restrictions in order to facilitate their joining or leaving ships.

IMO circular letter 4202 Add.6 provides details of how to determine if a person is a seafarer and should be classed as a key worker, while IMO circular letter 4204 Add.14 details how States can facilitate crew changes. INTERTANKO's Crew Change Management Plan details the practical steps that crewing managers should put in place during a crew change.

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Crewing managers will need to undertake crew changes at the earliest point possible. Senior officers' reliefs should be staggered where possible and due regard given to the crew matrix. However, priority should be given to crew who are approaching or have exceeded the contract time as agreed in their SEA. The negative impacts of accumulated fatigue and loss of motivation may well have a greater effect than changing more crew. The charterer should be kept informed of decisions taken to ensure the highest level of operational efficiency.

Prior to entry into port, the crew manager should ensure that crew changes can take place taking into account local regulations and restrictions at the time. In considering crew changes, the manager must ensure that flights are operating, including transits. Crewing managers must also ensure that seafarers have the right visas for all transits. This may continue to prove difficult in some countries due to consulate closures.

Seafarers signing off or on should keep with them documents showing that they are seafarers to assist in their transit. Off-signing crew members should also complete a health declaration form.

Crewing managers should ensure that seafarers have proof of their status as a seafarer, provided by any of the following documents:

- official seafarers' identity documents
- discharge books
- STCW certificates
- seafarer employment agreements

In addition, the seafarer must also hold a letter of appointment from their maritime employer.

4. Statutory Surveys, Audit, and Certification

Due to the Covid-19 pandemic, statutory surveys, inspections and/ or audits may not have been conducted because surveyors, service providers, or the ship owner's own representatives were unable to attend the ships. Some owners/ operators may have experienced additional operational challenges, such as shipyards or dry docks temporarily ceasing operation or disruptions due to slow or non-delivery of equipment and parts needed for their activities.

There have been cases where the ship owner's/ operator's internal audit schemes (i.e. International Safety Management (ISM)/ International Ship and Port Facility Security (ISPS)/ MLC) could not be implemented due to restrictions imposed for sending internal auditors on board to carry out the required annual shipboard internal audits. In such cases, close consultation with the respective Recognised Organisation (RO) and Flag Administration is required for obtaining either an extension, or consent of both parties for conducting a scheduled internal audit remotely.

The IMO has issued a series of circular letters starting with Circular Letter No. 4204. The circulars touch on Covid-19's impacts on the shipping industry, including implementation and enforcement of mandatory IMO requirements, and encourage flexibility. Several of IMO's Member States (Flag Administrations) have taken pragmatic approaches, on a case-by-case basis, through one or more of the following actions:

- Postponement of all surveys, audits, and inspections within a specific range of due dates for a period of three (3) months (note: some administrations issued extensions up to six months),
- Extension of surveys/ inspections/ audits or the validity of statutory certificates, accompanied by a recommendation from the ship's RO.
- Approved remote audits and surveys where supported by the RO.
- Acceptance of electronic certificates while Covid-19 measures are in place.

Further to above, the IMO issued Circular Letter No.4204/Add.7 "Coronavirus (Covid-19) – Guidance concerning unforeseen delays in the delivery of ships". In this case, IMO drew the attention of the Member States and international organisations to the unified interpretations related to the delay of new building deliveries previously approved by the Maritime Safety Committee. This Circular pays attention to oil tankers and bulk carriers of 150m in length and above, which were to be delivered before 1 July 2020 but have now been delayed.

IMO continues to issue updates and new circulars to take into account the evolution of the current crisis. These can be found at <http://www.imo.org/en/MediaCentre/HotTopics/Pages/Coronavirus.aspx>.

Notwithstanding the pragmatic approach taken by the IMO and many Flag Administrations, some regional requirements, such as those implemented and enforced through European legislation, may need to be considered separately. For example, delays in conducting surveys for and certifying the Inventory of Hazardous Materials (IHM) for compliance with the EU's Ship Recycling Regulation are not yet accounted for by the European Commission. As such, the European Commission has, to date, not issued any form of derogation or delay in the enforcement of the regulation after 31 December 2020.

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- a) The obligation to ensure satisfactory completion of the survey, inspection, audit, and certification lies with the ship owner/operator. Due consideration should be given to closely monitoring the due date and providing information about the ship, its location, and developing a survey plan.

- b) In developing the plan, the ship owner/ operator should collate the due dates for the certification, testing, and inspection of all equipment. This should be undertaken in close collaboration with the ship to ensure that no equipment is missed.
- c) The ship owner's/ manager's first point of contact should be the Flag State. The latest instructions and information from Flag Administrations should be monitored. At the recommendation of the Flag Administration and where appropriate, advice on survey activities should be sought from the RO.
- d) During the pandemic, records and supporting documents should be kept of communication and exchanges regarding the extension of the survey, postponement, or remote verification and, if required, presented during subsequent revalidation or reinstatement of the correspondent certificate. The supporting documents should include a signed statement from the vessel's Master confirming that the ship is in a condition to satisfactorily continue in service in line with the agreed period of extension granted.
- e) Particular attention should be paid to any conditions or requirements imposed by the Flag State or the RO at the time when the extension or postponement was granted. In seeking such extension or postponement, the ship owner/ operator might have submitted an action plan to bring the ship back into compliance once the relevant restrictions are lifted.
- f) The ship owner/ operator should bear in mind that each case will be different, subject to the type of survey, the maximum allowable period of extension/ postponement, and Flag State's requirements. The owner/ operator should follow up with Flag Administrations at the earliest opportunity until surveys, audits, inspections, and certification are fully restored to normal.
- g) In cases where ship owners or operators are changing Flag Administrations, laying up, reactivating, undertaking conversion, or retrofitting new equipment on-board a vessel, they should consider any processes which may require further attention to prevent any oversight or lapses of the regulatory requirements.

The International Association of Classification Societies (IACS) has established a Task Force outlining actions its members agreed as an initial response to Covid-19 related challenges. These can be found on the IACS dedicated webpage <http://iacs.org.uk/covid-19/>.

One important decision taken by IACS Class Societies was to share each other's surveyors during the pandemic. This is not common practice among class societies, but this measure was deemed to be "exceptional and duly justified" in the current condition, so that surveyors avoid unnecessary travel in restricted areas, supporting the safety of surveyors and vessel crew, as well as the broader public health of the countries concerned.

The IACS Covid-19 Task Force also identified measures that its class society members can implement in a coordinated way, such as:

- use of relevant IACS Procedural Requirements (PRs) such as those related to the application of 'force majeure' and 'exceptional circumstances' for class purposes
- development of temporary amendments to current PRs to provide a period not exceeding three (3) months for the completion of class surveys
- amendments to facilitate the transfer of class by allowing the gaining society, in coordination with the owner, to better plan the surveys in advance
- development of a standard request form that may be used by IACS Members when seeking to utilise an exclusive surveyor from another IACS Classification Society

- development of specific health and safety guidance for surveyors to facilitate their access to sites/ ships, to cover matters such as adherence to and support of site/ ship security access controls along with site/ ship health and safety measures, use of protective equipment, masks, gloves, soap, hand-sanitisers and temperature monitors and up-to-date guidance on Covid-19 prevention measures.

In addition, the IACS Covid-19 Task Force maintains a list of detailed queries and relevant specific responses available on the IACS website.

5. Vetting Inspections

Normal CDI, SIRE, and OVID (Offshore Vessel Inspection Database) inspection regimes have been difficult to maintain due to inspectors being subject to travel restrictions, denied access through terminals and needing to comply with social distancing and health and safety considerations depending on location.

OCIMF and CDI have encouraged stakeholders to apply a pragmatic approach and called upon operators and inspection submitting members to maintain close communication.

OCIMF further encourages all decisions concerning inspections to have safety and health considerations of the inspector, the vessel crew, the terminal staff, and the general public at their forefront. With this vision in mind, a pragmatic approach includes consideration of the following:

- Carefully evaluating the need for an inspection: Can an inspection be deferred to a later date – is it essential at this time?
- If the inspection goes ahead, what steps need to be taken to adequately protect the people involved, including social distancing and PPE as well as notifying all parties of any symptoms or health issues post inspection? (Refer to the Temporary Covid-19 precautions during an Inspection guidance developed jointly by INTERTANKO, CDI and OCIMF).
- Recipients of reports are encouraged to take a pragmatic approach when reviewing reports against the current Covid-19 background.

In April 2020, OCIMF temporarily extended the availability of live reports in the SIRE and OVID programmes to 18 months. Similarly, CDI, on a case-by-case basis has extended the active ship report for a period of two months from the anniversary date of the initial inspection.

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- a) The ship owner/ operator should have a SIRE/ CDI restoring schedule or plan in place. Vessels may be prioritised based on the last physical inspection done on-board, the validity of active SIRE in the OCIMF/ CDI database, the method of the last inspection conducted (self-inspection, screening or psychical attendance), vessel age, business needs and charterers' requirements.
- b) The SIRE/ CDI inspection restoring schedule or plan should be discussed with charterers and reviewed regularly. Consideration should be given to the increased demand for SIRE inspections and subsequent availability of inspectors at disports. Where feasible and in agreement with charterers, a loading SIRE may be considered as an alternative to a discharge SIRE to avoid further delays.
- c) The plan and documented evidence of restoring normal and customary ship operations should be made available (including e.g.: Officer and crew matrix compliance, ship owner or operator visits, shore drug and alcohol annual test, ship/ shore cargo operation interface, etc.).

- e) Some state, terminal, or inspecting company imposed travel restrictions, similar to current restrictions may remain in place longer term. INTERTANKO maintains regularly updated consolidated information on ports and terminals where SIRE/ CDI inspections are allowed and possible, accessible to Members on the INTERTANKO website.
- f) Ship owners/ operators are advised to engage early and proactively with the submitting member/ service provider/ charterer with regards to any challenges that may be experienced in conducting SIRE inspections.
- g) As the pandemic subsides and crew reliefs resume in a normal manner, it is likely at least initially, that many of the seafarers on board will have exceeded their contract length and will wish to disembark. Crew reliefs will need to be planned with care during this time, as relieving large numbers of personnel simultaneously could create issues with crew matrix compliance requirements. However, the welfare of the crew must take priority over matrix compliance. Owners/ operators should demonstrate the management of change in cases where there is a deviation from crew matrix compliance, and the submitting member/ service provider/ charterer should take a pragmatic approach recognising the benefits of having a fresh crew on board.

6. Ship Building and Repair Yards

Many repair schedules have been heavily affected by major financial and commercial impacts of Covid-19. While most shipyards are open, delays in repair and construction work continue as they are working on reduced manning levels to enable social distancing. In many shipyards, owners are still unable to arrange yard visits, which has impacted the schedule of ship repairs. There have been other challenges such as:

- Foreign vessels calling to conduct dry docking and alongside-repairs have been required to first self-quarantine at a suitable anchorage for at least 14 days. In most cases, time spent from the previous port of call to the arrival port could have been taken into account in reducing the quarantine period at anchorage.
- Delays in dry dock due to the non-availability of spares.
- Shortage of technicians, especially for specialised work such as statutory services and machinery work, where they need to travel to site from different parts of the world.
- Reduced work hours in dry-dock to maintain local restrictions imposed due to Covid-19.

Classification societies may grant extensions of up to three months to the Special Survey and Docking survey end of range in exceptional circumstances. Ship owners/ operators may consider further postponement of the Special Survey and Docking by an additional three months under force majeure where the Flag Administration agrees, and information is provided from the vessel to enable remote examination of the vessel to be performed by an authorised surveyor.

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- a) The ship owner/ operator should ensure that the necessary supporting documents, records and communication exchanges relating to delays/ extensions granted for dry-docks and/ or underwater inspections carried out as an interim solution should be maintained, and if required presented during subsequent requests. In all cases, consultation and consent of the respective Flag Administration and Classification Society shall be sought.

- b) It is likely that shipyards will be overbooked for dry-dock/ repairs after the pandemic, and it may be difficult to get the desired dates for docking. Ship owners/ operators should have a strategy to attempt to schedule dry docks as soon as possible, if they cannot be scheduled and carried out on time. The strategy should take into account the chronology of validity of the statutory certificates, retrofitting, and updated IMO and Flag Administrations guidance on possibly granting further extensions/ postponements of the statutory due dates.
- c) It is prudent for ship owners and operators to review the terms and conditions of the yard to identify potential areas of dispute prior to commencement of any work. It may be necessary to negotiate some of them, such as the limitation of the liability amount and delayed delivery penalty clause.
- d) Owners/ operators are advised to closely liaise with charterers for timely planning of a suitable dry-dock.
- e) Owners/ operators should assess the suitability of the dry-dock available. As many shipyards are expected to be overbooked, some other repair yards may offer service.
- f) It is also important to assess the external subcontractors, consultants, specialists used during docking to gauge their capability to deliver the services on time. Responsibility between subcontractors and ship owners should be clarified between the parties.
- g) Due allowance needs to be made to the supply of spares as the lead time might increase considerably. Keeping contact with suppliers ahead of time to make sure spares are in stock and ready for delivery when restrictions are lifted is recommended.
- h) Early planning with the RO/ Class is highly recommended to ensure the availability of surveyors and qualified technicians for timely completion of survey work in the yard.
- i) Due to the rescheduling of the dry dock, a considerable increase in the workload of the technical team ashore should be expected. In order to assist the technical Superintendents, senior ship staff could be used on secondment during this period, providing invaluable exposure and preparing them for future shore assignments.
- j) The dry dock may also be affected by crew change as it may not be possible to stagger the crew sign on/ sign off as required. General practice is that the Senior Officers join the vessel at least one month before the dry dock so that they are involved in the dry dock process and until the first cargo operation afterwards. Advanced planning is therefore very important.

7. Annual and Routine Servicing

Most Flag States have now given extensions based on a declaration from the Master or responsible person that the vessel remains in compliance with the requirements of the relevant instrument to avoid any impact on the day-to-day operation of the vessels. During the pandemic, there are very few ports where these services are available as technicians/ surveyors are not able to attend the ships due to local lockdown and travel restrictions.

Where a vessel requires a survey due to major repairs or modifications, the Flag Administration may issue a short term certificate in exceptional circumstances.

SOLAS III Regulation 20.8.1.1 permits an Administration to extend the period of servicing of Life Saving Apparatus such as inflatable life-rafts/ lifejackets to 17 months where servicing at the required interval is impracticable.

Where permitted by the Flag Administration, routine servicing can be completed by the designated person on-board (usually the Chief Engineer) and a required extension or validation of the certificate may be obtained based on photographic evidence submitted by the ship.

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- a) As the world recovers from the pandemic and more and more countries lift their travel restrictions, shipping companies will have more opportunities to carry out the mandatory servicing of the equipment.
- b) Again, it is expected that there will be a surge in servicing requests, which may create a shortage of qualified technicians to attend the vessel at the required port.
- c) A shortage of RO surveyors may also be anticipated. Consulting IACS planned guidelines and early planning with the RO is recommended.
- d) Members will have to consider initially carrying out these services at anchorage or during transit between two convenient ports.

8. Chartering Matters

It is important for all stakeholders in the shipping chain to be aligned with what is expected once the restrictions have been lifted. Back office support should also undertake due diligence to ensure that all documents and claims which were raised during the pandemic can be executed without any further delay. Steps to be taken may include:

- a) Post-fixture departments should be familiarised with time bars and the consequences to reclaiming demurrage if these are missed; if any extensions to time bars have been agreed, then it will be important to prioritise these to ensure demurrage calculations can be settled in a timely manner and with correct documentation where possible.
- b) All outstanding documents; original, signed and stamped are requested via Master/ agents once practically possible.
- c) Owners should review their charter parties for specific clauses relating to Covid-19 and remove these from future fixtures. Owners should also review charter party SIRE/ CDI requirements to ensure compliance where such inspections have been suspended or cancelled during the outbreak to ensure these are re-instated as soon as the vessel's trading pattern permits.
- d) Owners should remain cautious that crew changes/ dry-docks/ owners' matters in port (SIRE/ CDI inspections) may take longer than expected and owners should remain modest when calculating ETAs and lay cans to avoid potential cancellation.

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