



Challenges in the International Oil Pollution Compensation Regime

A Cargo Owners' Perspective from Japan

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What is “Petroleum Industry Marine Association of Japan (PIMA)”?

- ✓ Established in 1971 after Torrey Canyon oil spill
- ✓ Represents cargo owners in oil pollution matters
- ✓ 27 active member companies in 2025



Japan's Role in the IOPC Funds

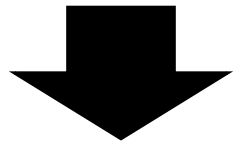
- ✓ 2nd largest contributing country (2023)
- ✓ 10.4% of global total

【 Contributing Oil Recived in 2023 】

Top10 Member States	Contributing Oil received in2023	% of Total
India	240,968,687	16.28
Japan	153,935,134	10.40
Netherlands	143,679,138	9.71
Republic of Korea	137,281,033	9.28
Italy	102,234,811	6.91
Singapore	84,860,463	5.73
Spain	69,589,452	4.70
Thailand	54,021,554	3.65
France	49,409,482	3.34
United Kingdom	47,529,479	3.21

Key Concerns for Cargo Owners

Principle: The equal sharing of liability
between shipowners and cargo owners



- ✓ Eroding liability balance
- ✓ Rising environmental costs



① Dark Fleet & Mystery Spills

(Uninsured Vessels)

- ✓ Gulfstream spill (Trinidad & Tobago)
- ✓ Mystery spill in Israel



Source : Ministry of Energy and Energy Industries

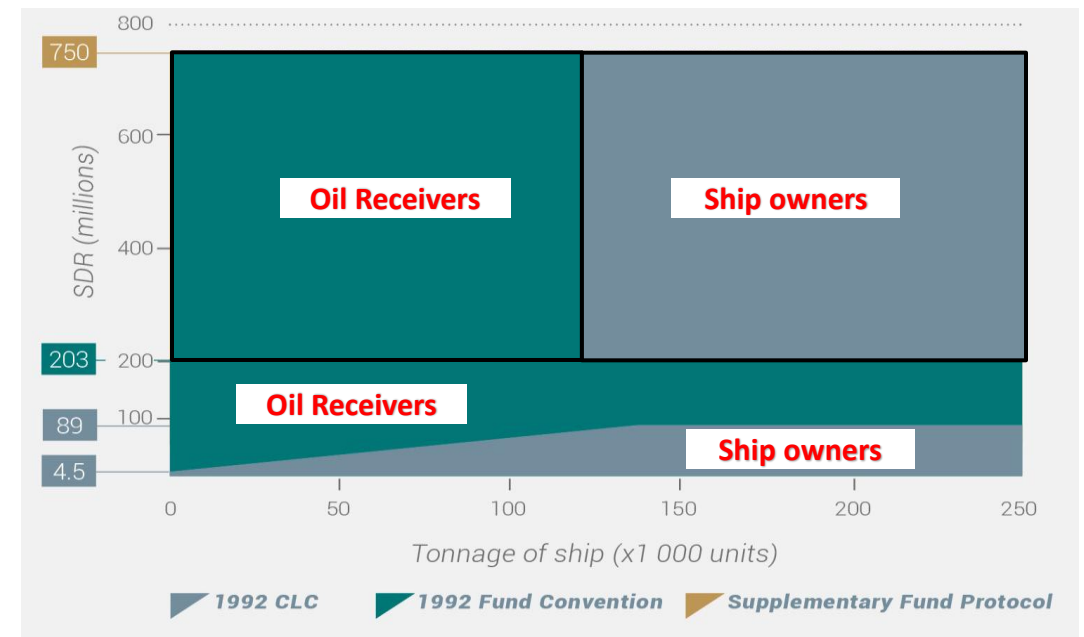
② Rising Damage Beyond Liability Limits Small tanker < 2,000 GT

- ✓ Princess Empress, Terra Nova
- ✓ No compulsory insurance



③ The Need for Proactive Adjustments

- ✓ Last revised in 2003
- ✓ Costs have increased significantly



What If Nothing Changes?

- ✓ Risk of member withdrawals
- ✓ Sustainability of the regime at stake



Caution Toward HNS Convention

- ✓ Commendable principles,
but cargo-owner concerns persist



Toward Shared Solutions

- ✓ Need for cooperation
- ✓ Role of CMI





Thank You for Your Attention

