

ARGENTINE COAST GUARD

Ref: SNAV, NA9.-

BUENOS AIRES, August 24, 2011

TO THE MANAGING DIRECTOR OF PANDI LIQUIDADORES S.R.L. - MR. ALBERTO TRIGUB:

This maritime Authority has noticed an increase in the delays that hinder the possibility of fluid traffic in connection with those vessels which sail the Paraná River with draughts over 34 feet, which circumstances have a negative impact in the traffic management and aspects related with navigation safety and the protection of the environment.

We are concerned that vessels sailing with a draught beyond the recommended maximum, according to the characteristics of the main shipping channels could affect the shipping transport in this important waterway to the ocean, and the problem is further affected by the lack of sufficient roads and anchorages and waiting areas for heavy laden vessels.

We must point out that in the channel between Escobar to Recalada pilot station, anchorages and waiting areas usually have depths of about 10.36 m (34 feet), and considering an average 60 cm height of tide, vessels with over 34 feet draught must consider this situation, considering the safety margin under the keel, to avoid anchoring waiting for favorable tide, thus generating further delays to the system.

Faced with this problem it is necessary that all those involved in the industry work together to revert this trend which could lead, if not checked, to the need to adopt measures to increase the current under-keel safety margin in order to guarantee maintaining the pre-existing safety parameters and that the waterway continues to be safe and swift for everyone using it.

Considering the above and aiming to maintain the navigational safety standards, preserving the environment and protecting the waterways, the Centro de Navegación is requested to ask its members to take the necessary steps so that the vessels sailing the Main Shipping Channel between Santa Fe and the sea do so with draughts not exceeding 34 feet, and reminds all parties that resolution SNAV, NA9 N°: 028/2007 still continues to be in force. This resolution is attached hereunder for ease of reference.

Yours truly

ARGENTINE COAST GUARD

BUENOS AIRES, JUNE 15, 2007

RESOLUTION SNAV, NA9 N°: 028/2007

In view of the works that deepened the main shipping channels to 10.36 m (34 feet) in the stretch between San Martín/San Lorenzo and Recalada pilot station, and the increase in the maximum draught of the vessels, the reports from the Navigation Safety Office and,

CONSIDERING

That Ordinance N° 04/00 (DPSN) complementing the Navigation Regulations in Paragraph 3, Chapter 1 of the REGINAVE (Sea, River and Lake Navigation Code), establishes the Particular

Navigation Regulations for given areas rivers and channels, decreeing that in such areas ships must have at least 0.60 m clearance under the keel.

That this Maritime Authority has observed that frequently vessels with a draught over 34 feet had caused during their navigation through the main shipping channel delays that affected the uninterrupted traffic of other vessels, which situation greatly increases the risks of incidents and hinders safety in navigation and the protection of the environment, and this led to a recommendation for those involved in shipping that the draught of vessels in this stretch should not exceed 10.36 meters.

That as a consequence of the dredging works that deepened the main shipping channel to 10.36 in the stretch between San Martín/San Lorenzo and Recalada Pilot Station, there was a significant increase in the number of vessels with draughts beyond the maximum recommended draught, generating various obstacles in maintaining an efficient traffic management as well as the minimum safety standards, which situation were connected to the fact that the dredging works were carried out in the main shipping channel only, and not adapting the complementary areas used in navigating (maneuvering, anchoring, traffic coordination, pilot boarding, etc.).

That after a meeting of the Navigation Administrative-Technical Consulting Council, it was found it is imperative to carry out complementary works in the main shipping channel, so that it can safely manage deep laden vessels and fully use the depths available in the main channel, according to the seasonal variations and the tides, and this would in turn bring significant improvements in the water transport in this strategic waterway.

That analyzing the above problems it is necessary to establish additional safety parameters to the Ordinance 04/00 (DPSN) in order to minimize the potential risks and thus maintain the standards from a navigation safety point of view, the preservation of the environment and the management of traffic, until the current conditions are changed.

That this Maritime Authority is empowered to regulate the navigation in National Jurisdiction waters, as per articles 31, 34 and 39 of Law N°20094 (Navigation Law), as well as article 5, paragraph a) item 2° of Law 18.398 (Argentine Coast Guard Code)

Therefore

THE NAVIGATION SAFETY POLICE DIRECTOR

RESOLVES

Article 1: Reiterate the recommendation originally issued by this Maritime Authority, regarding vessels using the main shipping channel in the stretch between San Martín/San Lorenzo and Recalada pilot station should do so with draughts not beyond 10.36 meters.

Article 2: Establish for those vessels choosing to sail with draughts between 10.36 m and 10.67 m a minimum under the keel clearance of 0.60 m, in accordance with Ordinance N° 04/00 (DPSN) plus an additional centimeter for each centimeter beyond 10.36 meters.

Article 3: Establish for vessels with draughts over 10.67 meters a minimum under the keel clearance of 0.91 m.

Article 4: This regulation shall be in force as from 00:00 hours on July 16, 2007, and shall continue to be in force until the current situation of the channels and adjacent areas is changed.

Article 5: Communicate to the central Operations Department, the Coast Guard Stations in the area involved, Organisations, Chambers and Associations of the shipping industry involved for the information of their members. Publish in the Merchant Marine Bulletin. File.