Depletion Allowance in Coal Industry

A B Ghosh

Increasing costs of coal-bearing properties and the urgency of encouraging mechanisation of mines justify the granting of depletion allowance on cost-basis for all acquisitions of coal bearing lands after a fixed date.

The problem of depletion allowance does not exist for properties held on payment of a periodical rent by the operator of the mine. Where, however, the operator has proprietary rights acquired at a cost, the urgency of the need for depletion allowance depends on the magnitude of the cost relative to the extracted plus unextracted quantity of coal.

The older proprietors, having acquired their collieries from zamindars at prices extremely low considering the extent of the reserves, did not feel the burden of acquisition. But recent proprietors or even older ones attempting expansion through new purchases with a view to mechanisation, have a sound case for being granted depletion allowance.

Implementation of any scheme for grant of depletion allowance, however, would depend on a satisfactory solution of the problem of eliminating intermediaries.

Depreciable assets can be of four types, viz, (a) inherently wasting material assets on which labour and capital had been invested (e.g., a machine), (b) inherently wasting material assets consisting of natural resources only (e.g., a mineral area); (c) wasting rights to material assets which did not themselves waste (e.g., leases of land); and (d) wasting rights to 'immaterial' assets which might themselves be of limited duration (e.g., patent rights).

A manufacturing industry is interested in the first type. The proprietor of a coal mine is interested also in the second type which gives rise to the demand for depletion allowance.

The case for depletion allowance can be broadly stated as follows: Given the demand schedule for a manufactured product, the production unit has, more or less, a perpetual life; for, the plant and equipment can be reproduced at the end of the appropriate period of time through the investment of the depreciation reserve built up during the period by the annual deductible charge to revenues permitted by the Tax Authorities. For a coal mine, however, recapture of the value of building and equipment at the end of an appropriate period of time through the permitted depreciation reserves accumulated over a period does not help perpetuation of the production unit, with a given demand schedule, as the main asset, the mine, is a wasting asset of type (b) above. Unless, therefore, investment in coal mines is such that a deductible item for income tax purposes, the investor in coal mining is discriminated against compared to the investor in a manufacturing industry. The claim is therefore put forward that the actual cost of acquiring a coal mine be charged to revenue over a period of time in the form of depletion allowance that would have the same relation with type (b) wasting asset as exists between depreciation allowance and type (a) wasting asset.

The above may be elaborated. A depreciation reserve provides for the replacement of capital assets of particular categories (emphasising the real capital aspect) when demand for the product is constant, and for diversion of productive resources when demand for the product changes (emphasising the finance capital aspect). Provision of depreciation allowance by Tax Authorities to arrive at the assessable income looks after the above aspects in the case of reproducible capital assets i.e., type (a) wasting asset in any economy whether comprising of public sector only (that has acquired the asset with or without compensation payment) or a mix of public and private sectors.

Depreciation and Depletion

In the case of irreproducible or irreplaceable assets, e.g., a coal mine, depletion reserve provides not for the real capital aspect but for the finance capital aspect mentioned above whether the mines come to the possession of the public or the private sector with or without compensation payment.

The fundamental distinction between depreciation and depletion allowance is that "the factors of expiration of time, natural decay, wear and tear, and obsolescence, which are so prominent in considering the question of depreciation of industrial plant are absent" in the case of a mine; "for, in the case of the mass or source of natural raw material and of land intended for sale, the only question for consideration is the proportion which the annual depletion of the mass bears to the whole mass (known or estimated) which originally represented the capital outlay." This distinction while oddly pointing to a common problem of all wasting assets, viz, the problem of valuation, emphasises the special difficulties in the case of mines owing to the uncertainty of measuring the magnitude of the mineral bed inside the earth's crust. This is minimised where the cost of acquiring the mine reflects its bedded store of minerals. It is no doubt impossible "to determine with accuracy the proportion which the annual waste taking place in the property of Collieries, mines etc bears to the total cost of such property. It is, however, always possible to obtain sufficient data to fix the value of such property for selling purposes; and this is generally done by means of estimates of the total number of tons of ore contained in the mites, the assay value per ton, and the cost per ton of raising, smelting and marketing, from which data a capital value is fixed, which is considered by the purchasers safe and sound enough to justify them in risking their capital in the venture."

Denial of depletion allowance gives rise to an anomaly where a colliery is worked on a royalty basis. The U K Royal Commission on Taxation of Profits and Income (1955) pointed this out in the following:

"If a mineral area is worked on a royalty basis, so that the right of ownership of the minerals is acquired by annual payments, the royalties are in effect, recognized as a charge against taxable profits, either by being treated as a deductible expense or by being treated as the subject of tax recoupment against the recipient. They are taxable income of the recipient. Yet, if a mineral area is acquired by outright purchase and then worked, exactly the same practical operations take place. The mineral extracted is the raw material of the mining venture, it is extracted and sold, or extracted and pro-
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duced and sold, and the proceeds of what is sold are in part the operator's price for what he himself has bought. But under the present system (in U K) the gross proceeds of his sales have to be brought into the account of his profits without allowance for the cost of acquiring, what is, in effect, his stock" (Para 431).

In both cases the colliery will come to an end, "and, therefore, each annual revenue account, containing revenue produced by the sale of that product, must be charged with a proportion of the cost of the property before there can be any profit for the year." *8

Although, as noted above, coal bearing property can claim depletion allowance mainly from the finance capital aspect, there is here a real capital aspect also, issuing out of the problem of conservation of natural resources. The obligation to conserve resources for future generations introduces the inter-temporal social opportunity cost which necessitates a mark-up of price to reduce present consumption. This mark-up takes care of at least the interest on unauthorised portion of the asset. *9

There are three methods of calculating depletion allowance viz cost method, percentage method and discovery method. The cost method is comparable to the unit of production method of calculating depreciation allowance. The total cost to be written off is divided by the estimated number of units of the unextracted mineral to determine the charge per unit. Where, however, the basis is not cost but fair market value on some date, the valuation problem is much more complicated and controversial than that of a building, machinery or equipment. Under the percentage method a percentage of the gross income from the coal bearing property is deducted during the taxable year. Computation under the discovery method "is similar to the computation under the cost method except that, the basis is the fair market value at the date of the discovery of the mineral by the taxpayer,"*10 or within a specified number of days thereafter. (See also Section III Para 5 below).

When depletion allowance is permitted by Tax Authorities, financial position of the production unit is improved through enhancement of its ability to increase its investible resources both internally and externally.*11 In U S A depletion allowances are a major component of internal financing in mining. Taking mining and manufacturing companies together, depletion accruals have, in recent years, amounted to approximately 29 per cent of the total amount of depreciation and depletion accruals and approximately 15 per cent of gross internal financing.*12

It is sometimes contended that shareholders in mining concerns often prefer to take their proportion of surplus profits in the form of dividends and make their own arrangement for depreciation. Even if this were true, it is not clear why this concession should be granted to shareholders in mining concerns only and leave the consumption of capital resources to their choice. In fact, the case for depletion allowance, as noted earlier, rests not only on the need to distinguish between capital and revenue and to avoid payment of tax by mining concerns on capital as well as income but also to prevent capital consumption.

II

A depletion allowance is permitted by governments in most of the industrially advanced countries in their mining taxation structure,*13 with the exception of United Kingdom. Yet a fuller treatment of U K's case is quite relevant owing to the traditional influence of her economic thinking and practice on official thought and policy in India. The Colwyn Committee in 1920 had disposed of the claim for depletion allowance as follows: "If the proprietor of a mine that produces an income of £5000 a year is to be granted an allowance sufficient to enable him to replace his capital when the mine is exhausted, it would be inequitable to refuse an analogous allowance in respect of the initial capital invested in the education and training of a lawyer or surgeon or workman whose earning power is possibly of a shorter duration than the life of the mine". (Para 182). The strength of this plea has considerably diminished since by the gradual acceptance of the latter idea though not to the fullest extent. Kaldor says, "In some countries (particularly, I believe, in some of the Scandinavian countries), an attempt has been made to widen the range of expenses allowed for an employee so as to embrace expenses incurred for the general maintenance of earning capacity".*14 Yet, it was only as late as 1949 that U K conceded a depletion allowance to purchases of only overseas mineral rights by U K citizens.

The U K Royal Commission on the Taxation of Profits and Income (1955) recommended depletion allowance in respect of the acquisition of mineral rights or areas in future for sums paid only after the introduction of the scheme the basis of "relief being the actual monetary cost less any residual value of the land at the close of working". They rejected the suggestions made by some witnesses to the effect that, "(a) depletion allowances should take the form of a fixed percentage of gross income or profit, irrespective of the money actually spent on acquisition on the lines of various schemes which they cited as appearing in the tax code of the U S A, Canada, Southern Rhodesia and other territories; or (b) that a depletion allowance in respect of cost should be capable of free acceleration at the option of the mine operator", because they did not consider that "the circumstances of a mining venture are sufficiently peculiar to warrant its operator being granted a form of depreciation allowance which is of a different nature from that granted to the rest of industry and commerce under our system" (Para 445).

Considering a familiar argument against the grant of depletion allowance that "if an allowance for depletion is given to the mineral venture, then unless the money received by the vendor is charged to tax there will be a contraction of the tax base and a loss of the tax which ought not to be allowed in the interests of revenue", (Para 437), they pointed out in reply that it will be an impossible rule to say that a payment by one person cannot be allowed as a deduction unless it can be taxed as a receipt of another and maintained that the argument is based on the assumption "that there is in the country a taxable fund of 'economic' income attributable to the capital represented by the assets of industry and commerce as a whole and that this fund ought not to be affected by allowance for any sums paid by individual taxpayers for the acquisition of natural resources upon the creation of which neither labour nor materials have been expended". (Para 439). Stressing the impossibility of ensuring that the tax allowance permitted to one would be exactly equal TO the tax imposed upon another they rightly state that, "No doubt there lies behind the theory of the Max base a real misgiving that, if a mining venture is allowed a depletion allowance in respect of the cost of its mineral area inflated sums will be paid as the price of acquisition. But it does not seem to us that this danger ought to be averted by the process of attributing an unreal profit to the operator of the mine. There would be no difficulty in making special provision for collusive sales .... But this affords no valid reason for maintaining a rule that computes the tax-
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able profits of a mining venture upon a basis which declines to recognise an obvious element of cost" (Para 440). Characterising as dogmatic the assertion that the granting of a depletion allowance to the purchaser of a coal mine will merely result in a higher price "protanto being exigible by the vendor" that asserted that "actual transactions of purchase and sale do not arrange themselves as neatly as this . . . and since we do not look upon the vendor's receipt as being naturally taxable as income we are not disposed in any event to favour a distorted method of taxing the purchaser's profits in order to do indirectly what we do not wish to see done directly". (Para 444).

Inspite of the strong support for depletion allowance given by the 1955 Royal Commission in U K, the coal industry there is not permitted this allowance. (See Section III Para 5 below). However, "an initial deduction of 20% is allowed with respect to the cost of the construction of mining facilities which are likely to be of little value at the time when the mineral deposit is exhausted or abandoned. There is also an investment allowance of 20% for new expenditure incurred after April 7, 1959. The two may be claimed in respect of the same expenditure. For winning access to mineral and oil deposits annual allowances in the nature of depreciation allowance are granted for expenditures on exploration and testing". (Taxation in U K World Tax Series, Harvard Law School 1957. Pages 295-296). The similarity between the British and the Indian system will be evident from below.

III

Indian mining industry's case for special treatment regarding depreciation and depletion allowance was considered by the Taxation Enquiry Commission (1953-54). They recommended some concessions to minerals of the non-bedded variety (Vol II, Page 93).

Mining operations involve expenditure of the following types, e.g., (1) expenditure on the acquisition of the mineral property; (2) preliminary expenditure on exploration; (3) expenditure on development after exploration; and (4) expenditure on buildings, machinery, plant etc other than those included in (2) and (3) above.

The first type of expenditure consists of (a) dead rent and surface rent are allowed as deduction from income for income tax purposes; royalty is treated as an admissible deduction where it is calculated on production or as a charge on profits, but not where it is in the nature of a sharing of profits; and salami is prohibited by the Mineral Concession Rules 1949 for all leases following that date. The Taxation Enquiry Commission recommended that salami expenditure against profits for losses preceding 1949 be allowed "as a charge against profits spread over a specified number of years" (Vol II Page 88 Sec 9). As regards the second type of expenditure viz preliminary expenditure on exploration, neither the private sector in coal nor NCDC has to incur it today as the Geological Survey of India and the Bureau of Mines have been entrusted with the task.

The third and the fourth types of expenditure may be considered together. The present position is that besides the normal rates of depreciation for buildings, furniture and fittings, and rope way structure allowed to industries in general, the income tax authorities provide for the following special depreciation rates for mines and quarries e.g., surface and underground machinery 15 per cent, boilers and head gears excluding moving parts 8 per cent, shafts and inclines 7 per cent, portable underground machinery 25 per cent and tramways on the surface 10 per cent; renewals on coal tubs, winding ropes, haulage ropes, sand stowing pipes and safety lamps are allowed as revenue expenditure in the year concerned.15 The coal industry tax payer should be allowed the option, as recommended by the Taxation Enquiry Commission for non-bedded minerals, to claim either the rates of depreciation mentioned above or "that the original cost of such plant or machinery and buildings, less their estimated residual value at the time when the mine is likely to cease working may be amortised." (Vol II Page 92 See 24).

Regarding development expenditure the coal industry likes others has been enjoying the normal depreciation allowance, extra allowance for double shift and development rebate. This last was increased from 20 per cent to 35 per cent in 1963-64 for a period of three years.

As regards depletion allowance the Taxation Enquiry Commission commented on the three types mentioned earlier that the first type "served exactly the same purpose in respect of wasting assets as depreciation allowance does in relation to fixed assets" and the latter two forms "now acts more as an incentive than as amortisation of a necessary element of cost in order to arrive at the true profits of a business" (Vol II Page 95). For non-bedded minerals they recommended amortisation of original cost and proposed to provide incentive through either the development rebate or a system of tax holiday because the operation of the discovery value method of incentive "will be difficult as the art of estimating the ore content and its value has not yet developed in this country; and hence such a concession will be largely based on guess work;" and the maximum benefit of the percentage method will be secured by "long-lived prosperous concerns which are already making substantial profits and which, therefore, are least in need of any tax incentive. On the other hand, most marginal mining concerns which have to struggle hard for their consolidation, will derive little, if any, benefit from such an allowance." (Vol II Page 96).

Present System

The position in India today is that in place of the percentage method and discovery value method of depletion allowance, that is, the incentive provider types of allowance prevailing in countries like U.S.A, there has been existing for some years the initial depreciation allowance and development rebate on the U.K pattern in respect of all minerals; and deduction in respect of wasting capital asset is provided is certain circumstances in respect of depletion of mineral oil only to a person "carrying on the business of prospecting for, extracting or producing mineral oils in association with the Central Government". Also, "where the acquisition and realisation of mining rights is "in the course of a company's trade, the cost of acquiring mining rights" is allowed as a trading expense.16

The claim for depletion allowance by the coal industry thus boils down to the request for amortisation of the cost of acquiring coal-bearing property. The problem does not exist for properties held on the payment of a periodical rent by the operator of the mine. Where, however, the operator has proprietary rights of some degree acquired at a cost, the urgency of the depletion allowance depends on the magnitude of the cost relative to the extracted plus unextracted quantity of coal. The old proprietors having acquired their collieries from inexperienced zamindars in the Bengal and Bihar coalfields at prices very much low relative to the quantity of coal embedded did not feel the burden of acquisition.18 Even
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as late as 1939 and 1943 consideration money charged by the Panchkote Raj for leases of coal bearing areas for 999/99 years was between Rs 20 and Rs 24 per bigha and by the Burdwan Raj, between Rs 4 and Rs 10 per bigha. Recent proprietors or older proprietors attempting enlargement of the size of collieries through fresh purchases with a view to mechanising operations put forward the loudest claim for depletion allowance owing to the high prices at which coal-bearing properties have been changing hands recently. The following table gives consolidated figures of the sale of coal bearing areas in West Bengal between 1951-61.

<table>
<thead>
<tr>
<th>Year</th>
<th>Consideration Money (Rs '000)</th>
<th>Area (Bighas)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1951</td>
<td>140</td>
<td>5641</td>
</tr>
<tr>
<td>1954</td>
<td>60.5</td>
<td>2203</td>
</tr>
<tr>
<td>1955</td>
<td>200</td>
<td>815</td>
</tr>
<tr>
<td>1956</td>
<td>100</td>
<td>2100</td>
</tr>
<tr>
<td>1959</td>
<td>475</td>
<td>1820</td>
</tr>
<tr>
<td>1960</td>
<td>415</td>
<td>4157</td>
</tr>
<tr>
<td>1961</td>
<td>847</td>
<td>6005</td>
</tr>
</tbody>
</table>

The second column gives only the recorded consideration money. The tendency for collieries to change hands is also indicated by the transfer of 158 collieries in West Bengal alone since 1946 through sale, change of managing contract or opening of new areas. It may be mentioned that W Bengal has about 350 collieries.

Rapid industrial development of India within the accepted pattern of ever growing public and private sectors justifies the adoption of all reasonable measures to encourage the hitter. Increasing costs of coal-bearing properties and the urgency of encouraging mechanisation of mines suggest the granting of depletion allowance on the cost basis for all acquisitions of coalbearing lands after a fixed date on the U K pattern recommended by the 1955 Royal Commission. Implementation would of course depend on a satisfactory solution of the problem of eliminating intermediaries.

The claim for depletion allowance was lately put forward by the Chairman of the Indian Mining Association at its annual general meeting held in Calcutta on March 7, 1964 when he said that "Together with the higher development rebate given earlier the Government has indeed come a long way to meeting the industry's viewpoint, but I am disappointed that the need for a depletion allowance is still to receive recognition." The claim is however not of recent origin. It was placed before the Taxation Enquiry Commission as far back as 1953-54 by the spokesmen of the mining industry. That the demand and existed as early as 1943 is evident from the following observation of Lord Wright in the case Kamakshya Narain Singh Vs C I T (1943). "There is under the Indian Act no provision for allowance for amortisation in respect of the minerals being exhausted", though the Act does allow for diminution in the value of buildings, machinery, plant, furniture and animals. (Kanga and Palkhivala: "Income Tax" Vol I (5th Edition) page 3301)

This provides against capital consumption and correctly distinguishes between income and cost categories. Of "All capital outlay on wasting assets consists merely of payment made in advance on revenue account, all of which are constantly expiring in the service of the revenue account, and therefore, the value of the capital investment cannot be upheld except by regular and adequate contributions, which must be retained out of revenue receipts by being charged to revenue account" [Leake, P D "Depreciation and Wasting Assets" (1917) Page 131, 5]

Notes
3. A factory, a farm, a railway, a dock, may exist indefinitely. Particular parts may be changed; buildings may be altered; equipment renewed; but the enterprise itself may continue in the same place as long as there is a need for its product or service. A mine is different. It is sunk, it is developed, it is worked out and it is closed. This obsolescence and closing of mines is a normal feature of the industry, and indeed essential to its nature." (page 46).
4. The claim for depletion allowance was lately put forward by the Chairman of the Indian Mining Association at its annual general meeting held in Calcutta on March 7, 1964 when he said that "Together with the higher development rebate given earlier the Government has indeed come a long way to meeting the industry's viewpoint, but I am disappointed that the need for a depletion allowance is still to receive recognition." The claim is however not of recent origin. It was placed before the Taxation Enquiry Commission as far back as 1953-54 by the spokesmen of the mining industry. That the demand and existed as early as 1943 is evident from the following observation of Lord Wright in the case Kamakshya Narain Singh Vs C I T (1943). "There is under the Indian Act no provision for allowance for amortisation in respect of the minerals being exhausted", though the Act does allow for diminution in the value of buildings, machinery, plant, furniture and animals. (Kanga and Palkhivala: "Income Tax" Vol I (5th Edition) page 3301).
8. As also in India.
9. In fact, the mark-up device is used by the U S S R to provide for depletion reserves. "Capital formation by state enterprises, which constituted the bulk of Soviet investment, is financed primarily by interest free grants from the budget. The cost of capital is therefore not included in the explicit cost price structure of state enterprises, but is reflected implicitly in the mark-up over cost. The same is true of depletion cost." (Holzman, F D, "Soviet Taxation" 1955, Harvard. Page 88) It may be noted that, typical commercial costs of a Soviet enterprise include wages, raw materials and intermediate products, depreciation and short term interest but not returns for exceptional entrepreneurial ability, costs of capital, depletion costs and rent "all of which are explicit cost categories in capitalistic enterprises". (Ibid page 87).
10. Grant, E I and Norton P T "Depreciation" (1949) page 240.
12. Cf Creamer, Dobrovolsky and Borenstein "Capital in Manufacturing and Mining" (NBER 1960) page 132.
15. "Rates of royalty in respect of mining leases for coal have been specified under the Mines and Minerals (Regulation and Development) Act 1957. From the second schedule to the Act, it will be noted that the rate of royalty for coal and coke is shown as 5 p e of the f o r statutory price subject to a minimum of 50 nPs per ton. This rule is applicable to all mining leases granted after the 25th October 1949. The rates of royalty in respect of pre-1949 leases varied considerably but on and from the 29th December 1961, lessees who obtained mining leases prior to 25th October, 1949, are required to pay royalty at the rate specified in the deed lease or at 2½% of the for price, whichever is higher. In the case of outlying coal fields,
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the rates of royalty have been traditionally higher and there are cases where lessees have and continue to pay royalty at rates ranging from 10 to 25% of the statutory price of coal. (Replies to the Questionnaire issued by the Central Wage Board for the Coal Mining Industry submitted by the Joint: Working Committee of the four mining associations; July 1963, page 21).

Also cf Kangra and Palkhivala: "Income Tax" Vol I. "Mining royalties or rent, taxable as income, may be (i) a lump sum or (ii) a fixed annual sum, or (iii) a royalty on the amount of minerals extracted, called tonnage royalty, or (iv) such a royalty but not less in the aggregate than a fixed amount each year, called minimum royalty. The minimum royalty is a species of annual guarantee; it does not correspond to any coal in fact extracted and taken away; it is simply income flowing from the covenants in the lease, contingent on the lessee's failure to take the minimum quantity of coal. It would be payable if in any year the lessee took no coal at all, or if the coal in the mine was completely exhausted before the termination of the lease. A lump sum received on assignment of a contractual right to realise rents or royalties from coal fields for a certain number of years has been held by some courts "to be mere advance payment of royalty and assessable as income" (page 151). As for salami "it is for the income tax authorities to show that there do exist facts which would make the salami income." Where the lease is in perpetuity or for a very long term such as 999 years or of an indefinite duration on terms winch imply an element of stability and permanency the salami has been regarded by the courts "as a capital payment for the transfer of a capital asset. The presumption would be that it is the purchase price, not based upon the estimated out-turn but paid in exchange for the long term transfer. The distinction seems one of degree rather than of kind, recurring payment at short periods being treated as income and a single payment of a similar kind covering a long period being treated as capital, but after all the income tax Acts are not cast upon absolutely logical lines". (Page 150).

"Amalgamation of Small Collieries" by A B Ghosh. The rights of intermediaries to collect rents and royalties from the lessees and sub-lessees, however, still remain unsettled owing to the cases pending in the law courts. (Indian Mining Federation, Report of the Committee for 1962 Page 182).

Road Transport in Fourth Plan

The Transport Development Council has endorsed the recommendations of the working group set up by the Ministry of Transport at the instance of Planning Commission that the allocation for road development in the Fourth Five-Year Plan should be about Rs 1,150 crores. The Council has also indicated the lines on which State plans for the next five-year Plan should be formulated.

The Council stressed the need to have an integrated road plan, both for the Centre and State Governments, to meet the requirements of various sectors of the National economy. It has recommended that a phased programme based on certain priorities should be drawn up. It was decided that there should be an economic justification for the scheme to be undertaken and large projects should be backed by cost-benefit studies. In view of the increasing number of heavy vehicles, the Council recommended the adoption of higher specifications for roads.

A road plan should be framed, keeping in view the requirements of the region as a whole, special attention being given to less developed areas, such as Nagaland, Manipur and Assam, which were also border areas.

The Council recommended priorities for various categories of road and emphasised that the National Highway system should be adequately expanded to meet the requirements of a developing economy.

In regard to roads of inter-State importance, the Council has recommended that the Centre should help financially in the construction of bridges near boundaries of the States, while the State Governments should build the required connecting road links to these bridges.
He's just learnt his last lesson

He's not alive to learn any more. You can learn these simple cycling lessons. And live.

- Where there's a cycle track—use it
- Always ride in single file. It is dangerous to carry people or bulky parcels. You'll lose balance
- Keep both hands on the handle bars, except to remove one for signalling clearly
- It is dangerous to hang on to another moving vehicle
- Be specially careful on wet roads

Road Safety is a matter of life...and death

Issued in the interest of Road Safety by Burmah-Shell.