



MARINE ENVIRONMENT PROTECTION
COMMITTEE
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Agenda item 4

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PREVENTION OF AIR POLLUTION FROM SHIPS

Observations and comments relating to the revised marine fuel specification ISO 8217:2010

Submitted by Norway and INTERTANKO

SUMMARY

<i>Executive summary:</i>	This document provides comments upon and relating to the revised specification of marine fuels as provided for in ISO 8217:2010
<i>Strategic direction:</i>	7.3
<i>High-level action:</i>	7.3.1
<i>Planned output:</i>	7.3.1.1
<i>Action to be taken:</i>	Paragraph 11
<i>Related documents:</i>	MEPC 59/4/3; MEPC 60/4/42 and MEPC 61/4/1

Background

1 This document is submitted in accordance with the Guidelines on the organization and method of work of the MSC and MEPC and their subsidiary bodies (MSC-MEPC.1/Circ.2) and comments on document MEPC 61/4/1 (ISO).

Introduction

2 At its fifty-seventh session, the Committee agreed to send to ISO a list of typical fuel oil parameters relating to safety (ship safety, engine performance and crew health) and the maritime environment (air quality) for review and their advices as to the selected parameters relevance to capture the main issues surrounding safety and the maritime environment. This listing is recorded in annex 1 to document MEPC 59/4/3 (ISO).

3 In paragraph 8 of document MEPC 59/4/3, ISO reports that their Working Group had reviewed the list and provided a list of parameters together with maximum/minimum limit values (as appropriate) for the full range of marine fuels qualities that it thought were pertinent to these safety and maritime environmental criteria. This listing can be seen as annex 2 to document MEPC 59/4/3.

4 The ISO listing and advices, as provided, confirmed the pertinence of the parameters in the original listing forwarded to them by MEPC 57 and added the additional parameters of Vanadium, Acid Number, Lubricity, Used lubricating oil content, and Hydrogen Sulphide.

General observations

5 The co-sponsors would congratulate ISO on their successful and quick production of their new standard for marine fuels – ISO 8217:2010, particularly as advancement has been achieved in defining a better fuel quality standard for marine fuels by reference to the differences between the parameter limit values as recorded in document MEPC 59/4/3 as compared with the final standard limit values as annexed to document MEPC 61/4/1.

6 The comments provided by the co-sponsors would however refer to the fact that an ISO standard for marine fuels is a commercial standard that is referred to and used as the guiding specification for marine fuel purchase contracts. In this regard, ISO 8217 has no mandatory character and, therefore, there currently are no control mechanisms for the quality of marine fuels delivered to ships. To that extent, the ISO 8217 standard is usually referred to for commercial redress (litigation) in the event that off specification fuel is found to have been delivered to an individual ship. In other words, the ISO 8217 standard alone does not provide preventive means against possible negative impacts on ship safety, engine performance and crew health which, as the co-sponsors understand, was the primary scope of the Committee request to ISO.

7 The Informative (advisory) Annexes, that are not part of the ISO 8217:2010 standard, supply advices and in certain of them identify circumstances for which parameter testing criteria are incomplete to secure safe fuel quality to ships. Notably amongst these advices are the issues of the inclusion of bio-derived products (annex A), deleterious materials (annex B) and hydrogen sulfide (annex D) in marine fuels where the latter has a standard value but remains at a level (limit value) that would be unsafe to the ship's crew.

Comments

8 The co-sponsors would note ships do occasionally receive marine fuels that do not meet the ISO 8217 set limits. Unfortunately, many times the tests run by laboratories on behalf of the shipowners cannot detect elements like deleterious materials. As a result, a significant number of incidents are recorded and the off spec nature of the marine fuels is determined only after the incidents, including blackouts occur. It is the co-sponsors' view that the control of the quality of the fuels could be improved prior to being delivered to ships to minimize safety impacts on ships.

9 With regard to the advices contained in (informative) Annex D (hydrogen sulphide) to the revised specification and the limit levels specified in both Tables 1 and 2 of the specification together with the advices contained in annex 2 to document MEPC 59/4/3, it is to be appreciated that the limit values stated are maximum concentrations of this substance in the liquid phase of the fuel oil. When this substance evolves into a vapour or gas phase its concentrations are very much larger and can be up to a multiple of 100 times greater. ISGOTT is the main industry publication that addresses the safety and handling for this substance but all references in this publication are concentration in gas phase rather than in liquid phase as stated in the specification. Further ISGOTT is primarily a tanker reference publication, therefore such guidance may not be known by all types of ships. General guidance should be produced for general shipboard use to satisfy the information and recommendations from ISO in their statement that "it is critical that ship-owners and operators continue to maintain appropriate safety processes and procedures designed to protect the crew and others (e.g., surveyors) who can be exposed to H₂S vapour".

Conclusions

10 Norway and INTERTANKO are strongly of the view that the quality of marine fuel oils delivered to ships is of vital importance to ship safety, crew health and environmental protection. Therefore, when addressing document MEPC 61/4/1 and the impact of the marine fuel specifications, the co-sponsors would invite the Committee to also address and discuss the need to improve proper control on marine fuels prior being delivered to ships. The question is whether the only retro-active assessment of fuel quality by the shipowners after the fuel is delivered to ships is adequately responding to the Committee's aims to secure safety of ships and its crew and to achieve environmental protection. In this regard, the Committee may wish to consider whether there is a need for mandatory requirements to ensure fuel oil quality prior to it being delivered to the ship.

Action requested of the Committee

11 The Committee is invited to consider the comments on this document when discussing document MEPC 61/4/1 and take action as appropriate.
