



## VISWA LAB

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### TECHNICAL UPDATE: 2010/3/10

#### IMPORTANT ADDENDA TO “Comments on clause 5 of ISO 8217 2010”

Please refer to our technical update (2010/3/7 - Comments on clause 5 of ISO 8217 2010) which also included a note on Annex B for Deleterious substances. We have a very important point to make on. The existing regulations under Marpol Annex VI regulation 18 states the following

*Fuel oil shall be blends of hydrocarbons derived from petroleum refining*

*Fuel oil shall be free from inorganic acid*

*Fuel oil shall not include any added substance or chemical waste which either:*

*Jeopardises the safety of ships or adversely affects the performance of the machinery,*  
*or*

*Is harmful to personnel, or*

*Contributes overall to additional air pollution”*

It will be seen that the above is very similar to clause 5 of ISO 8217:2005. What is now being proposed in the ISO 8217:2010 final draft will directly conflict with the wording in existing clause 18 of Marpol Annex VI. A careful study of the wording will convince one that the existing clause 5.1 of ISO 8217:2005 and the existing regulation 18 of Marpol Annex VI at least have some teeth to deal with bunker fuel supplies which are blended with chemical waste or contaminants and which have potential to cause machinery problems. Adopting the new final draft with Annex B on Deleterious substances will totally render clause 5 ineffective and give the supplier a free rein.

Please read this along with our Technical Update 2010/3/7 - Comments on clause 5 of ISO 8217 2010. We hope that, at the very least, the wording of 8217:2005 is retained both in the proposed 8217 2010 and also in the new Marpol Annex VI. **This is very important.**

Please do not hesitate to contact us with any questions.

Best regards,  
Dr.Vis