

Manager of UK Oil Spill Treatment Products Approval Scheme, Marine Environment Team, Marine and Fisheries Agency, Area 6B, 3-8 Whitehall Place, London, SW1A 2HH

Telephone: 0207270 8644 **Spill Alerts** 0870-785-1050 (*Office Hours*) **Fax:** 0207 270 8708

Shared Mailbox : dispersants@mfa.gsi.gov.uk Personal **Email:** Michael.meekums@mfa.gsi.gov.uk

Website: <http://www.mfa.gov.uk/met/spills.htm>

Your Ref:

Our Ref: ODA 142

Date: 9 May 2008

Dear Consultee

REVIEW OF THE UK OIL SPILL TREATMENT PRODUCTS APPROVAL SCHEME

I wrote to you on 15 February 2007 inviting your views on the consultation on the review of the UK Oil Spill Treatment Products Approval Scheme. The replies have been analysed and the views expressed have been taken on board. I am writing to inform you of the outcome of this review:

International Standardisation

Review proposal – Q 1-2. Is there scope for international standardisation of tests?

Review outcome - The MFA and its scientists will continue to attend international meetings with the aim of seeking to develop common international standards.

Submission of product direct to laboratories for testing

Review proposal – Q 3. Should applications be submitted to MFA after tests have been completed?

Review outcome - Agreed to leave the scheme as it is, applications for new products can continue to be sent to the Marine and Fisheries Agency for them to co-ordinate the various tests so that the MFA act as a one stop shop. Agreed that applications can continue to be sent to independent laboratories for testing if required by manufacturers.

Obligatory use of the Rocky Shore Test

Review proposal – Q 4. Is there a need for a new approval regime to approve products designed to be used on Heavy Fuel Oils out at sea away from rocky shores?

Review outcome - Agreed to change the scheme so that the Rocky Shore Test is no longer required for Oil Spill Treatment Products designed to treat Heavy Fuel Oils unless they are to be used on Rocky Shorelines. This will involve designing a new testing protocol

to test these products. Mechanisms will need to be put in place to ensure that these products are used in appropriate circumstances.

Use of specific product to oil application rates as recommended by manufacturers when carrying out tests.

Review proposal – Q 5. Should testing be carried out with application rates recommended by manufacturer?

Review outcome - Agreed to leave the scheme as it is.

Use of a variety of oils during testing

Review proposal – Q 6-9. Should the testing regime be amended to test on a variety of oils?

Review outcome - Agreed to leave scheme as it is. If responders or manufacturers wish to test a product with a specific oil then they can approach the laboratories for an independent test.

Expand tests to vary Water Salinity and Temperature

Review proposal – Q10-11. Should testing regime be expanded to include variations in salinity and water temperature?

Review outcome - Agreed not to change the Scheme. If responders or manufacturers wish to assess a product under specific physical conditions of temperature or salinity then they can approach the laboratories for an independent test.

Continue research on impacts on Ultra-violet light on oil

Review proposal – Q 12-13. Should we continue to conduct research into examining the impact of UV on a range of commercially available and approved oil treatment products? Should the scheme be changed so that testing is carried out under UV light instead of artificial light?

Review outcome - Agreed not to change the scheme. Although no specific recommendation that this is an overriding priority it is recommended that this topic be kept under review for possible further research at a later date.

Use of Weathered Oils/Emulsified Oils in testing

Review proposal – Q 14-15. Would further research benefit our understanding of the relevance of oil weathering to the efficacy and toxicity? Should use of weathered and/or emulsified oils be considered for inclusion as part of the testing protocols?

Review outcome - Agreed not to change the scheme. Although no specific recommendation that this is an overriding priority it is recommended that this topic be kept under review for possible further research at a later date.

Approval for products other than dispersants

Review proposal – Q 16-18. Are there any other categories of oil spill treatment products, that can be used to treat marine oil spills, that are not covered by the current approval scheme?

Review outcome - Recognised that the MFA should work more closely with the recreational boating industry to get the message across that people should use more suitable products when cleaning oil off their boats. Although no specific recommendation that this is an overriding priority it is recommended that this topic be kept under review for possible further research, eg surface cleaners, at a later date.

Separate Testing for Type 2/3 dispersants

Review proposal – Q 19-20. Should the scheme be amended to introduce separate toxicity testing for both Type 2 (diluted) and Type 3 (concentrated) products?

Review outcome - Agreed that products should undergo testing for all of their modes of usage (ie Type 2 (diluted) and/or Type 3 (neat)). This will involve validation of test procedures for both application modes and the establishment of appropriate pass/fail criteria for each. Any currently approved products that this change affects will need to be retested and reclassified within 5 years of the introduction of the new testing protocols.

Efficacy test combined with Toxicity test

Review proposal – Q 21. Should we investigate the option of producing a combined efficacy/toxicity test procedure?

Review outcome - Agreed not to change the scheme.

Development of Screening tests

Review proposal – Q 22-24. Should cheaper screening tests be developed?

Review outcome - Agreed not to change the scheme

Changes to Product Formulation

Review proposal – Q 25. Should manufacturers be allowed to change formulations and if so by how much?

Review outcome - Agreed to introduce a graded assessment based on which group of constituents a chemical falls. Protocol to be developed and the Scheme booklet to be amended to explain the rules jointly by MFA and CEFAS.

Priority Research Issues

Review proposal – Q 26. What are the priority issues for research?

Review outcome -

- (a) Develop and validate a new testing protocol to test for products to treat heavy fuel oil.
- (b) Establish new separate pass/fail assessment criteria for approval of Type 2 and Type 3 dispersants.

Funding will be made available this year to undertake this research. The project is anticipated to start in 2008 and be completed in 2009.

Scheme Booklet

Agreed to update the scheme booklet.

Stakeholder Meeting

There will not be a stakeholder meeting this year but we anticipate holding one in 2009 to update you on the progress we have made.

Please contact me if you require further clarification on any of the points I have raised above.

Yours faithfully



Michael Meekums