

The Hon. P.F. Morris  
Chairman  
International Commission on Shipping  
39 Pillapai Street, Charleston, NSW 2290  
Australia

Our Ref : RL.6399

Date : 30 November 2000

Dear Mr Morris

**FUEL SAMPLING AT THE POINT OF CUSTODY TRANSFER IN BUNKER DELIVERIES**

I am writing to seek your support for "Custody Transfer Sampling" in bunker fuel deliveries. Before I describe the importance of this issue, please allow me to introduce my company, DNV Petroleum Services (DNVPS).

DNVPS is a wholly owned subsidiary of Det Norske Veritas (DNV), a leading ship classification society. As a non-profit foundation, our profits are channelled towards the DNV mission of safeguarding life, property and the environment.

DNVPS itself is the world leader in the marine fuel testing business, commanding over 70 per cent share of the international market. Our database on worldwide marine fuel quality is developed from over 500,000 samples and we can provide an accurate overview of fuel quality in any major bunker port.

In addition to marine fuel testing, DNVPS also offers onboard bunker quantity measurements in more than 100 ports around the world.

DNVPS operates five specialist fuel laboratories strategically located in Singapore, Oslo, Rotterdam, Fujairah in the United Arab Emirates and New Jersey. We are also in the process of setting up another five laboratories in Algeceiras (Spain), Houston, South Korea, Panama and Brazil. Our company headquarters is in Singapore.

We are presently lobbying for a common fuel sample to be taken at the point of Custody Transfer during a bunker delivery. This custody transfer point is normally located at the ship's bunker manifold where the risk and responsibility for the fuel passes from seller to buyer. Logically and assuming the right sampling device and method are used, a sample taken at this location will reflect the quality of the fuel actually delivered to the receiving vessel. Timely analysis of this single sample will in turn determine if the supplied fuel conforms to quality standards and will not compromise the safety of vessel, crew and cargo.

Unfortunately, the existing situation is that multiple samples are being taken at both the ship's end of the delivery hose as well as at bunker barge's end. Often, samples which have no relevance to the quality of the delivered fuel are even submitted for testing.

A seriously "off-specification" fuel can disable a ship within hours and hence it is important that a representative sample of the delivered fuel is taken and analysed on time.

In this regard, there are many incidents where the sampling valve on the barge has been shut off while sea water, waste chemicals or poor quality fuel is pumped into the tanks of unsuspecting vessels. When this happens, the sample submitted by the barge will meet required specifications even as the vessel incurs severe engine damage from burning poor quality bunkers.

To avoid such incidents, all it takes is to implement the practice of fuel sampling at the ship's end, where the sample will not be manipulated by dishonest suppliers. The ship's crew, on the other hand, does not have any incentive to tamper with the sample.

Custody Transfer Sampling is in line with trade practices endorsed by the International Chamber of Commerce. To promote its adoption, DNVPS has produced an informative video which is enclosed for your viewing. This video is distributed free to stakeholders in the international maritime industry and is backed by BIMCO, INTERTANKO, IBIA, the Maritime and Port Authority of Singapore (MPA) and many individual ship operators. Incidentally, MPA is amending the Singapore code of practice on bunker deliveries (CP 60: 1996) to specify the "custody transfer sample" as the official sample for all local bunkerings.

Ms Ai Hwa Gwee of DNVPS Singapore will contact you shortly to follow up on our discussion. Should you require more details in the meantime, Ms Gwee may be reached on phone number (65) 7713305, fax (65) 7795636 or email [aihwa.gwee@dnvps.com](mailto:aihwa.gwee@dnvps.com) .

Mr Morris, your support will encourage many ship operators and bunker suppliers to adopt custody transfer sampling. This will lead to greater assurance on the quality of delivered bunkers and in turn enhance ship safety.

On that note, we thank you for your kind attention and look forward to your favourable reply.

Yours sincerely

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cc. Ai Hwa Gwee, DNVPS Singapore