

# VGP Compliance Declaration - BIOGEAR XP

**BIOGEAR XP is an Environmentally Acceptable Lubricant (EAL) according to the definitions and requirements of the US EPA 2013 Vessel General Permit, as described below.**

## VGP Section 2.2.9

All vessels must use an EAL in all oil to sea interfaces, unless technically infeasible. "Environmentally acceptable lubricants" means lubricants that are "biodegradable" and "minimally-toxic" and are "not bio-accumulative" as defined in Appendix A of the permit.

## Environmentally Acceptable Lubricant Definition - VGP Appendix A

In order to be classified as an "Environmentally acceptable lubricant" the oil maker must determine that the lubricant is "biodegradable", "minimally-toxic" and "not bio-accumulative" as defined in Appendix A of the permit. Alternatively, oils that are labelled by one of several programs specified in the permit are regarded as acceptable.

**BIOGEAR XP** and its components have been evaluated by independent laboratories. Using these test results, Vickers Oils has determined that it meets the VGP definition of an Environmentally Acceptable Lubricant.

### Biodegradability / Non Bioaccumulation - VGP Appendix A

The VGP definitions of "Biodegradable" include lubricant formulations that contain at least 90% by weight of a constituent substance or constituent substances that give a minimum test result of 60% according to OECD 301B. For the 10% of the formulation that need not meet the above biodegradability requirements, up to 5% may be non-biodegradable (but not bio-accumulative) while the remainder must be inherently biodegradable. Acceptable test methods to demonstrate inherent biodegradability include >20% according to OECD 301B.

In order to comply with the 2013 VGP biodegradability / bioaccumulation requirement, it is necessary to consider the constituent substances. Only substances present in the formulation above 0.10% need be assessed. As stated above, the requirements for bioaccumulation only apply to non-biodegradable constituent substances.

The constituent substances of **BIOGEAR XP** meet the above requirements.

### Minimally Toxic - VGP Appendix A

The VGP definitions for "Minimally-Toxic" fluids include achieving acute toxicity results of at least 100 mg/L according to OECD 201, 202, and 203 (Algae, Daphnia and Fish).

**BIOGEAR XP** meets the above requirements.

## Record Keeping – VGP Section 4.2

Vessel must keep records on the vessel that include the Technical Data Sheets for all EALs used in Oil-to-Sea interfaces on board the vessel in order to prove compliance with the permit.



Peter JF Vickers  
Chairman & Managing Director

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