



CHAMBER OF SHIPPING OF AMERICA

MONTHLY REPORT FOR BIMCO

JUNE 2017

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NOTE TO THE READER: Reference to the Federal Register may be found at <http://www.gpo.gov/fdsys/browse/collection.action?collectionCode=FR>. Please note new address and format for Federal Register retrieval due to upgrade in US government website.

References to legislation may be found at <http://thomas.loc.gov/> by entering the bill number (HR 802, S 2841) in the "search bill text" block found at the center of the page.

USCG Request for Comments on Regulatory Reform

In response to the relatively recent Executive Order signed by President Trump, the US Coast Guard has issued a request for comments on its current regulations and requests information as to which, if any, regulations should be reviewed with an aim to repeal, replace or modify them. CSA intends to submit comments by the July 10, 2017 and is currently polling its members for comments on specific regulations. At a minimum, CSA will focus on the need for alignment of the US regulations with international requirements with the ballast water regulations to be used as the case in point as well as addressing the current debate concerning sufficiency of salvage and marine firefighting services under the vessel response plan regulations. A copy of the Federal register notice may be viewed at [FR Vol 80-109 Evaluation of Existing Coast Guard Regulations](#)

On a general note, since the publication of the regulatory reform Executive Order, most executive branch agencies have issued similar requests for comments from the regulated community as is evidenced by our previous report which highlighted CSA's formal comments to EPA's request. While this is an opportunity for the regulated community to comment on a wide variety of issues covered by US regulations, it is unclear at this point, what, if any, pressure will be applied to executive branch agencies by the White House to actually respond to these comments with proposed changes to existing regulations. What is clear is that the executive order provisions which requires elimination of 2 regulations where a new regulation is proposed, has placed new regulatory initiatives in a "full stop" mode.



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USCG Issues Type Approval for a Fourth Ballast Water Treatment System

The US Coast Guard has issued its fourth US type approval certificate to Sunrui Marine Environment Engineering Co., Ltd. This system uses a three step process (filtration, electrolysis and neutralization) to meet the performance standards found in the US regulations and the IMO Convention. More details on this type approval may be found on the Marine Safety Center website at <https://www.uscg.mil/hq/msc/> Vessel owners are urged to contact the manufacturer to obtain a copy of the type approval certificate which contains all limitations applicable to this system. Of interest is the fact that the USCG issued an updated certificate clarifying certain provisions relating to installations in hazardous areas. Non-US flag vessels must meet the requirements of their flag administration while US flag vessels must meet the requirements of 46 CFR 111.105 which from our perspective, makes difficult, if not impossible the installation of this system on a US flag vessel due to materials/design/construction provisions found in the above referenced regulation.

Coalition Letter to Congress Regarding Salvage and Marine Firefighting (SMFF) Capabilities

As a result of a House Transportation and Infrastructure Coast Guard and Marine Transportation subcommittee hearing held in early May at which sufficiency of salvage and marine firefighting services was debated, a coalition consisting of the salvage industry, emergency responders and some shipping industry associations (including CSA), has submitted a letter to the subcommittee which advocates that sufficient SMFF resources exist across the US to meet the planning standards contained in the current regulations and that no additional dedicated resources are needed to meet these requirements. This coalition response was a result of an application for an Alternative Planning Criteria designation by Rapid Ocean Response which they argued was necessary due to the non-availability of vessels which could respond to an SMFF emergency across the geographies covered in the regulations. If granted, this could be interpreted as the need for additional and dedicated resources, a principle with which we do not agree. The coalition advocates that the current "vessel of opportunity" system continues to be viable and cost effective for the maritime industry as evidenced by the successful history of the US response industry in cases where SMFF services were required.



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CSA's 59th Annual Safety Achievement Awards

The U.S. maritime industry publicly recognized the merchant mariners responsible for safe ship operations at the Annual Safety Awards Luncheon held at the Hilton Riverside Hotel on June 7, 2017. Two Hundred and Eleven people, representing 53 companies and their subsidiaries attended the annual industry-sponsored event where **1582 vessels with 10,604 cumulative years of accident free operation were recognized**. Since 1958, the Chamber of Shipping of America (CSA) has also sponsored the Safety Achievement Award program which recognizes outstanding feats of safety that contribute to saving a life, a ship or other property. This was the Fifty-ninth Anniversary of the program.

Full Press Release: [2017 CSA Safety Achievement Awards Press Release](#)



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