

International Chamber of Shipping

38 St Mary Axe London EC3A 8BH

Tel +44 20 7090 1460

Fax +44 20 7090 1484

info@ics-shipping.org www.ics-shipping.org www.shipping-facts.com



12 June 2016

The Honorable Mitch McConnell
Majority Leader
United States Senate
317 Russell Senate Office Building
Washington, DC 20510

The Honorable Harry Reid
Senate Minority Leader
United States Senate
522 Hart Senate Office Building
Washington, DC 20510

Subject: S.373 - Vessel Incidental Discharge Act

Dear Senators McConnell and Reid,

I am writing on behalf of the International Chamber of Shipping (ICS) which is the global trade association for shipowners and operators. Our membership comprises national shipowner associations from 37 nations, including the Chamber of Shipping of America in the United States. We represent over 80% of the world merchant fleet.

The global shipping industry, which trades with U.S. ports, fully supports the Vessel Incidental Discharge Act (VIDA). This will help establish a single U.S. regulatory framework for a number of vessel discharges, including ballast water (and the related benefits for environmental protection) by greatly simplifying what is currently an overlapping and inconsistent regulatory situation.

This is a situation, moreover, which is not fully compatible with the mandatory rules adopted by the International Maritime Organization (IMO), with which all internationally trading ships will soon have to comply once the IMO Ballast Water Management Convention enters into force worldwide (almost certainly during 2017).

As well as the IMO Ballast Water Management Convention, the global shipping industry is currently subject to regulatory requirements imposed by the EPA, the U.S. Coast Guard, and several individual U.S. States. VIDA would greatly alleviate this often inconsistent and impractical patchwork approach to maritime regulation, as well as the uncertainty caused by the EPA's current Vessel General Permit.

We hope these comments are helpful, and appreciate the opportunity to comment on this complex U.S. issue which also has significant implications for the entire global shipping industry.

Yours sincerely

Peter Hinchliffe
Secretary General

Copy to:

Senate Committee on Commerce, Science, and Transportation:

Chairman John Thune (R-SD) and Ranking Member Bill Nelson (D-FL)

House Transportation and Infrastructure Committee:

Chairman Bill Shuster (R-PA) and Ranking Member Peter DeFazio (D-OR)

House Transportation and Infrastructure Committee/Coast and Marine Transportation Subcommittee

Chairman Duncan Hunter (R-CA) and Ranking Member John Garamendi (D-CA)