



CHAMBER OF SHIPPING OF AMERICA

MONTHLY REPORT

SEPTEMBER 2018

- **Participated in the International Chamber of Shipping's Policy and Maritime Law Committee Meetings and the Board of Directors Meeting.**
- **Met with EPA on the new Vessel General Permit.**
- **Participated in the industry roundtable working group for the third revision of *The Guidelines on Cyber Security Onboard Ships*.**
- **Attended the Port of Baltimore Navigation Safety Meeting.**
- **CSA met with the Bahamas Shipowners Association.**
- **Give CSA a follow on  [@CSAKnowships](https://twitter.com/CSAKnowships)**

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.

Status of US EPA Vessel General Permit (VGP)

As most are aware, we have been diligently waiting for EPA's issuance of the proposed third vessel general permit (VGP 3.0) and have been regularly in communication with EPA staff. Today, I had the opportunity to speak with EPA leadership about the status of VGP 3.0 which was originally set to be published in proposed form in late 2017 with a final permit originally to have been issued in the summer of 2018. We have repeatedly noted to EPA that a new VGP with significant changes in it would require some time for industry to modify its current compliance programs and given the current delay, it would be nearly impossible to adapt current compliance programs to any new requirements in the 2.5 months before the current VGP expires.

EPA leadership provided us with the following information which will be contained in a policy letter to be published and distributed by EPA in the near future.



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- EPA expects the new proposed VGP to be published in March 2019 with at least a 30 day comment period (we've asked them to consider a 60 day comment period).
- EPA has decided to administratively continue the current VGP (VGP 2.0) until such time as the final VGP 3.0 is issued which would almost certainly include some period before VGP 3.0 enters into force.
- Vessels which are currently covered under the existing VGP (VGP 2.0) e.g. have filed a NOI (notice of intent to be covered) and have implemented the current VGP, will automatically be covered by the administrative continuance and need do nothing additional.
- New vessels whose keel is laid prior to December 18, 2018 must file a Notice of Intent (NOI) to be covered which must be accepted by EPA prior to December 18, 2018 in order to be covered by the current VGP 2.0.
- If a vessel whose keel is laid prior to December 18, 2018 does NOT file an NOI, it will not be covered by the administratively continued VGP (VGP 2.0) and may not discharge any of the discharges covered by the VGP in the US until it files a NOI after the new VGP 3.0 is issued.
- A vessel whose keel is laid after December 18, 2018 will be covered only by the new VGP (VGP 3.0) after it is published in final form and the vessel files the required NOI.

We will provide you a copy of the EPA policy letter when it becomes available.

Save our Seas Act of 2018 (S.3508)

As CSA anticipated, the Save Our Seas Act which includes in Title II, Maritime Safety or more commonly known as the Maritime Safety Act of 2018, passed the Senate on September 26th and passed in the House again on September 27th. This bill now awaits the President's signature to sign into law. **We are preparing an analysis/summary of this final bill and will send it out soon to members once completed.** Here is a link to the full text of the Bill: [Save our Seas Act of 2018](#)

As you may recall, the House Transportation Committee and the Congressional Budget Office requested CSA to comment on multiple drafts of this bill which we did. CSA had success educating and steering aspects of the Bill to a more favorable outcome from the initial requirements.

CSA Annual Issues Report for 2018

CSA's Annual Issues Report was released to all members by email. This report briefs the issues that CSA is working on and tracking for members. Should you have any questions, please contact us.



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Link to the Annual Report: [CSA Annual Issues Report for 2018](#)

CSA Meeting Schedule for 2018

** Please save these dates on your calendars. For more see the CSA website
<http://www.knowships.org/news.php> **

NOVEMBER 7: Policy/Operations Committee in Washington, DC

NOVEMBER 7: Annual Environmental Awards Dinner in Washington DC

NOVEMBER 8: Board of Directors in Washington, DC



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