



Remarks of

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**“Meeting The Homeland Security Challenge:
Maritime and Other Critical Dimensions”**

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I. Introduction

America is a free nation that generally aspires to free trade. Our international transportation and trading system reflects that relative openness and freedom, and we all benefit from it. But today we face a serious, new challenge: How best to design and implement effective maritime security measures that will successfully defend our trading and transportation system from terrorism— while preserving the efficiencies and benefits which consumers, businesses and every national economy derive from today's system.

Meeting that challenge is not a simple task. “Maritime security” covers a variety of different, distinct industries and elements, including: inland waterways, port facilities, marine terminals, non-maritime facilities located on navigable waters, bridges, cruise ships, tankers of various

types, and the liner industry. My remarks today will address only the *liner shipping*¹ aspects of this agenda, which, while representing only a portion of the issues this Conference is reviewing, are substantial enough to have produced multiple “container security” initiatives within the Executive Branch, as well as a “Sixty Minutes” story last Sunday.

In 2001, the international liner shipping industry carried approximately 18 million TEUs (twenty-foot equivalent units) of containerized cargo in America’s international trade – roughly \$480 billion dollars worth of goods. That represents slightly over two-thirds of the value of all of the nation’s oceanborne commerce. It represents approximately 4.8 million containers of U.S. export cargo and 7.8 million containers of import cargo.²

Over 800 ocean-going liner vessels, mostly containerships and roll-on/roll-off vessels, make more than 22,000 calls at ports in the United States each year. That’s more than 60 vessel calls a day – providing regular scheduled services to and from virtually every country in the world. Liner shipping makes it easier and cheaper for U.S. exporters to reach world markets, and provides American businesses and consumers with inexpensive access to a wide variety of goods from around the world – strengthening our economy and enhancing our quality of life. The members of the liner shipping industry who comprise the World Shipping Council³ carry over 90 percent of this volume. They truly are “Partners in America’s Trade”, and they recognize that this partnership requires the industry to work effectively with the government to address the new threat that terrorists might try to use or attack our transportation system.

The immediate challenges are (1) to design the security process and deploy the capabilities necessary to minimize, detect and intercept security risks as early as possible – before they are loaded aboard a ship for delivery to their destination, and (2) to have the systems and international protocols in place to ensure the efficient flow of international commerce during all possible security conditions. We must protect the system that facilitates world trade, and prevent transportation assets from becoming means of delivering destruction. We must protect the lives of people who make the international trade system operate and who work and reside in areas through which trade flows. We must protect the nation’s ability to continue its trading relations in the event terrorists do attack. And, we must recognize that this terrorist threat is not going to go away, but only become more challenging to address as world trade volumes grow.

For that reason, what is at issue is not just maritime security, or the even the global, intermodal transportation system, but the flow of international trade and the world’s economic health.

Government officials have clearly stated their concern over the possibility that our international transportation system might be used as a conduit for terrorism. Accordingly, governments must devise and implement effective strategies to reduce and manage such risks,

¹ Unlike bulk carriers or “tramp” ships that operate for hire on an “as needed, where needed” basis, liner vessels operate in regular, scheduled services on fixed routes.

² Containers are different sizes, including 40 foot (most common), 45 foot, and 20 foot. For that reason a specific number of TEUs does not equal that number of containers, as a 40 foot container equals two TEUs.

³ The membership of the Council is attached as Appendix A.

and carriers, shippers, ports, marine terminals, importers and third parties need to support what is necessary to achieve those objectives.

At the same time, government officials have indicated that, if terrorists were to attack this system, the government response might be to shut down trade.⁴ That, however, would allow the terrorist threat to strangle international trade. It would be extremely damaging to the American and world economy. The government must have a strategy and the capability to ensure that trade continues to flow, even if there is an incident. The alternative would create an even greater incentive for terrorists to target the transportation industry, because the consequences would be so destructive.

There is no single solution for this problem. No single government agency can solve this problem. No single government can solve this problem on its own. Every commercial party involved in the transportation of goods has a role to play. Every government has a role to play.

Shippers, consignees, carriers, ports and terminal operators all fear that in the endeavor to address these security concerns, the free and efficient flow of commerce will be impeded, and that requirements may be imposed that unnecessarily impede commerce and raise operating costs, but do little to improve security. This is an entirely legitimate concern. The answer, however, is not to delay action. What is needed is for the government to clearly identify the new security requirements, and for the industry to work cooperatively and quickly with the government to determine the best, most efficient way to meet them.

After September 11, the World Shipping Council established a Security Advisory Committee in order to consider how the liner industry could assist the government in the effort to improve security and protect the flow of commerce. On January 17, the Council issued a White Paper, which was provided to the Department of Transportation, the Customs Service and the Congress. Based on that paper and the continuing commitment of the liner industry to help the government develop effective responses to these challenges, I'd like to offer the following observations.

II. The Challenges

Designing and implementing an effective maritime security program will require cooperation, information sharing, and coordination between government and industry. At the outset, the Council recommends that the federal government's strategy and actions should be consistent with certain principles.

First, there must be a unified, coordinated strategy to address the issue. We recognize that the Department of Transportation oversees transportation and the Customs Service oversees

⁴ Customs Commissioner Bonner has stated that "the shipping of sea containers would stop" if a nuclear device were detonated in a container. One can only agree with his comment that this would be "devastating", would cause "massive layoffs" in the economy, and that "we must do everything in our power to establish a means to protect the global sea container trade, and we must do it now." Speech of Commissioner Robert C. Bonner, before the Center for Strategic and International Studies, January 17, 2002, Washington, D.C.. Coast Guard officials have made similar comments.

trade, but improving the security of intermodal, containerized cargo shipments requires a tightly integrated approach and clear responsibilities. This is particularly true when considering information requirements for cargo shipments, which I will discuss later. It also requires government agencies to effectively share the information that they require.

Second, there should be clear, mandatory rules informing each responsible person in the transportation chain what is required of them. Voluntary programs designed to provide enhanced security levels and to expedite the transportation of low risk cargo are important and should be pursued. But, effective security against terrorist threats also requires clear requirements, with clear accountabilities, which are uniformly applied and enforced.

Third, the security regime must allow for the efficient flow of trade. Efficient transportation and secure transportation are not incompatible.

Fourth, international cooperation is necessary to effectively and comprehensively extend enhanced security to international supply chains. We all recognize that there are both

- legitimate concerns about unilateral U.S. actions that have international implications and about the need for international standards on many of these issues, rather than a crazy quilt of differing national laws, and
- legitimate concerns that the international community may not act with the urgency and determination that the U.S. government regards as essential.

This tension may be unavoidable, but it need not be destructive. It requires sensitivity and effective communication on all sides. It also requires action by the governments of all trading nations, because the United States cannot effectively undertake security screenings outside its jurisdiction without international cooperation.

III. Various Aspects of Containerized Cargo Shipping

A. Ships: On the issue of ship security, we fully support the various initiatives undertaken by the Coast Guard to address vessel security, both using their existing authority and in leading the initiative at the International Maritime Organization to obtain international agreement.

The Coast Guard immediately after September 11th implemented several measures to improve tracking vessels destined for U.S. ports and the crews and passengers onboard these vessels. Through its sea marshal program, implementation of safety and security zones around vessels and escorting certain types of vessels, the Coast Guard is also taking steps to prevent vessels from becoming terrorist targets or from being used by terrorists as weapons.

The Coast Guard has submitted to the International Maritime Organization (IMO) additional proposals pertaining to vessel security. Among the proposals are the designation of security officers on every vessel and in every company that owns or operates vessels; the availability of alarms or other means on a vessel to notify authorities and other ships of a terrorist hijacking; and the expedited installation on all vessels of the Automatic Identification Systems (AIS) by July 1, 2004, instead of the existing target date of 2008. AIS provides, among other

things, a ship's identity, position, course and speed. The Coast Guard has also proposed to the IMO an international system for the issuance of verifiable seafarers' documents and background checks of individual seafarers.

These and other proposals were discussed at a recent U.S. initiated working group meeting of the IMO. Additional IMO meetings are scheduled for later this spring and summer with a view to approving new international vessel security measures at a special IMO session in December.

It is too early to be certain which measures will be approved later this year by the IMO and thus become internationally binding requirements, but the Coast Guard's report on the IMO effort was very optimistic. As an international industry operating liner vessels with multinational crews, and under the jurisdiction of many different flag administrations, and calling ports in many different countries, the Council's member companies would prefer that, to the greatest extent possible, mandatory vessel security measures be agreed to at the international level. Clear and uniformly applied and enforced rules would create certainty and clarity for our vessels and their crews and help protect against breaches in, and of, the international supply chain.

B. Marine Terminals: The security of ports and marine terminals in this country was analyzed in the Report of the Interagency Commission on Crime and Security in U.S. Seaports (Fall 2000) and found wanting. This issue served as an impetus for the Senate legislation (S.1214) on this issue, which we have supported.

The Coast Guard, using existing statutory and regulatory authority and working with terminal owners and operators, has already implemented certain measures to increase security in and around waterfront facilities.

Earlier this year, the U.S. Coast Guard Commander for the Pacific Area issued guidelines for the individual Captains of the Port for the inspection and maintenance of adequate security measures for waterfront facilities in the Pacific Area. Developed in cooperation with industry stakeholders, these guidelines are intended for all types of maritime terminals and facilities. They cover areas such as physical property security, personnel security, passenger security, vehicle access and rail security, and are differentiated according to three risks levels. As guidelines, they do not replace or supersede existing regulations. Rather they are intended to assist the individual Captains of the Port and the operator of a facility in evaluating the security of that facility and taking corrective measures, if necessary. The guidelines are a constructive first step, but further actions are needed. For example, these guidelines do not address the issue of credentials and access controls for people at marine terminals.

The U.S. Coast Guard included in its submission to the IMO a proposal that all port facilities be required to develop and maintain security plans, and that these plans would have to be approved by the government in whose jurisdiction the facility is located according to internationally agreed standards. In addition to this proposal, the Coast Guard has also proposed that IMO agree to a mandatory requirement that every port undergo, by the government in whose jurisdiction it is located, periodic port vulnerability assessments based on internationally agreed vulnerability assessment standards. We fully support the efforts of the Coast Guard to raise

enhanced terminal security at the IMO, and believe that it is essential that international port security standards be developed and implemented. The Coast Guard has also begun the process of preparing to conduct vulnerability assessments of U.S. ports, and, towards that objective, is developing a so-called “Model Port” security concept.

C. Personnel: We support legislative and Department of Transportation efforts to establish a national credentialing program, with uniform, minimum federal standards for credentialing, with a federal background check process using criminal history and national security data, and “smart card” technology for the credentialing of appropriate transportation workers. It should cover people with access to restricted marine terminal areas and to vessels, the truckers hauling the container, and other security sensitive positions. America’s seaports should have systems to ensure and record that only approved people who are supposed to be there are there, and only when they are supposed to be there.

Many foreign ports have more developed security procedures than U.S. ports, and the institution of credentialing, background checks, and positive access controls at U.S. ports would be a constructive step to show the U.S. government’s resolve.

We also support the Coast Guard’s initiative at the IMO to establish an international credentialing and background check system for seafarers of all nations. The Coast Guard estimates that 200,000 seafarers a year come to the United States. The agency’s IMO proposal is a good-faith proposal to establish an internationally accepted system that would provide enhanced security and ensure the desired freedom of movement for seafarers.

D. Containerized Cargo: Containerized cargo transportation presents distinct and clearly complex challenges from a security perspective (1) because of the number of different entities in different jurisdictions involved in a shipment – those involved in loading and sealing the container, documentation of the shipment, storage, trucking, railroads, inland terminals, marine terminals, and the ocean carrier, (2) because of the current lack of a clearly defined and coordinated information system to receive, analyze and act on the data determined by the government to be necessary to pre-screen containerized shipments before they are loaded aboard a ship, and (3) because of the lack of an established or coordinated global capability to inspect containers, when warranted, before they are loaded aboard ships. Accordingly, we believe that it may be helpful to look at separate, but complementary, aspects of addressing this issue.

- 1) Operations: We support the government establishing:
 - a legal requirement that the shipper must seal a container originating in or destined for the United States upon stuffing it, and record the seal number on all shipping documents;
 - the standards that such seals must meet (preferably an internationally accepted standard);
 - a requirement that the party receiving the container at each interchange (e.g., trucker, railroad, ocean carrier) check and record the seal and its condition upon receipt;
 - a requirement that when persons having custody must break the seal for legitimate reasons, they be responsible for affixing a new one, noting the reason, and recording the new seal number on the documentation;

- procedures for when a container is received with no seal, a broken seal, or a seal discrepancy; and
- a requirement that no loaded container be stowed aboard a vessel without an intact, conforming seal.

While the industry recognizes that seals will not by themselves solve security concerns, the Council believes the above requirements would be an appropriate step to ensure a more secure chain of custody.

- 2) New Equipment Technologies: Council members have offered their support for government efforts in the research, testing, development and evaluation of cost-effective new technologies that could help provide enhanced security, such as electronic seals, and container tracking and intrusion detection technology. While such technologies have not yet been sufficiently proven to have government standards and be required, carriers will continue to work with the government in testing and evaluating such possibilities. Because there are roughly 11 million existing containers serving as instruments of international commerce involving multiple national jurisdictions, it is very important that any technology standards or devices be internationally available and accepted.
- 3) Cargo Documentation and Government Information Requirements: Customs Commissioner Bonner and the Coast Guard Commandant, Admiral Loy, have both spoken clearly about the need for container security initiatives to “push” the nation’s borders out, so that the government can acquire essential cargo shipment data in time to analyze the information and determine if further inspection of that container is needed *before* it is loaded aboard ship. The logic is clear and unarguable. The port of discharge is not the place or the time to check for terrorism.

If the vision of earlier, more effective container security is to become a reality, it requires better, earlier information about cargo shipments, and the capability to effectively inspect containers before they are loaded aboard ships. Let me turn to these issues.

The government’s objective is to obtain and analyze shipment information early enough to implement more timely and effective screening. The first step is for the government to establish its information requirements – specifically, what information does it need, from whom, when, electronically delivered to what information system? This has not yet been done.

Each person in the shipping process has a role and information: the importer who has ordered and is purchasing the goods, the shipper who is loading the goods into the container, the carriers who are transporting the goods, and the brokers and forwarders who assist in the cargo information process. Today, the earliest information *required* by the government is the ocean carriers’ cargo manifests. Most cargo manifests are electronically transmitted 48 hours in advance of arrival, but they are not required to be filed electronically and can still legally be filed in paper form at the time of vessel

arrival.⁵ Importers are not required by law to provide cargo information and make entry of the goods until five days after they have been unloaded (even more time is allowed if the goods are moving “in bond”). This is not the information process that is going to support accomplishing the government’s objective. The government must determine what will.

Ocean carriers are willing to do their part. They understand that the cargo manifest is a relevant source of information, and they will submit those manifests to the Customs Service when required. It is important to recognize that this cargo information is necessarily, in the case of a sealed container, the shipper’s declared cargo description. If the government determines that it needs more detailed information than is on the bill of lading and the cargo manifest, then it must obtain it from the appropriate cargo interests who possess that information.

Any government approach to addressing this issue must recognize the extensive programs currently being undertaken by the Customs Service and the information systems that they are presently operating and upgrading. It would make no sense to create a new cargo information system without, at the very minimum, addressing how it relates to the Customs Service’s programs and plans, and without ensuring that what is produced is a single, logical system that meets defined, coordinated objectives. Neither shippers, carriers, nor the government would be well served by competing cargo information systems at the Department of Transportation and the Customs Service. Yet, today we face that possibility, as the agencies and the Congress appear divided over who is responsible for this issue and what information system should be used to address it. New legislation is necessary to address this issue of cargo information; it is essential that such legislation provide a single, coordinated strategy and assignment of responsibilities.

Finally, we believe maritime security legislation should address export cargo, as well as import cargo. Effective attention to export cargo will demonstrate to the international community that the United States is committed to addressing security risks in a coherent fashion, and not just the risks involved in one direction of foreign trade.

4) Container Inspection Capability: There can be no argument that non-intrusive container inspection equipment⁶, operated by trained personnel, is necessary, and that this is a very important government competence. The Congress has increased funding for the Customs Service for this purpose; however, a strategy for enhancing such capability in ports around the world is needed.

⁵ NVOCC’s (which are responsible for up to 40% of the cargo in some trade lanes) are not subject to the same Customs bonding and information filing requirements as ocean carriers; they are not required to file cargo manifests for inbound shipments. They should be subject to the same information filing obligations at the same time as ocean carriers.

⁶ The term “inspection equipment” is used generically here, but recognizes that there are different kinds of equipment (e.g., mobile, crane mounted, hand held), using different technologies (e.g., X-ray, gamma ray) with different capabilities to identify different materials (e.g., drugs, radioactivity, carbon dioxide, explosives).

It is not feasible or necessary to physically inspect every container entering or leaving a port. It is necessary, however, for the government to have the capability to inspect those containers that it identifies as deserving further attention, whether that be on the basis of random selection or specific information. And the better the information about a shipment, the better the government will be able to identify which containers warrant such inspection.

Unless such inspection equipment and competence is available to government authorities, not only at U.S. ports, but also at overseas ports of loading, the government will have obvious difficulty accomplishing its objective. To be fully effective, an advanced security information system requires a way to check out a questionable container before it is loaded on a ship heading to or from a U.S. port. That's the point of advanced awareness.

Perhaps the U.S. government can convince the IMO to address this issue, although it is not obvious that any existing international organization has the authority or the intent to address this. Perhaps bilateral agreements with our trading partners can provide for this. But, it is an issue that requires immediate inter-governmental planning and execution. Inspection equipment standards should be agreed upon, and inspection capabilities and international cooperation protocols established. Delay in having this capability means that the government will have one less effective tool to intercept dangerous cargo, and to keep commerce flowing in the event of a terrorist incident.

- 5) Sharing Information: While there are many aspect of addressing this issue, intelligence will be a key part of securing the transportation infrastructure from terrorist's threats. Appropriate means should be developed for sharing intelligence alerts and warnings on a timely basis with designated carrier personnel.

III. Moving Forward

The Coast Guard has done a magnificent job in responding to maritime security since September 11, as has the Customs Service. Maritime security has been improved because of their efforts, and their enhanced vigilance and intelligence efforts continue. The challenge is to build on those efforts and create a more complete, unified and permanent set of security procedures and systems that can better ensure the safety of America's foreign trade.

But we are now more than six months since September 11, and as Admiral Loy stated last week to the American Association of Port Authorities: "We're talking about what we ought to do rather than getting on with the job of getting it done." The Admiral is correct.

The first and most fundamental requirement of "getting it done" is for the government to clearly establish who is in charge of what. With respect to ship and port security, the Coast Guard would seem to be clearly in charge. With respect to container security issues, clear responsibility has not been assigned. The resulting confusion is not only slowing the

development and implementation of an effective government response, it is confusing foreign governments, as well as carriers and shippers, all of whom are essential actors in the effort to better protect international trade.

1. *First, there must be a unified, coordinated strategy to address this issue.*

The Coast Guard and the Customs Service have articulated a sound vision for the desired outcome. The vision is to have a system in place that allows the government to screen cargo containers before they are put on ships sailing for U.S. ports. Such a system may have reciprocal rights for our trading partners, such as the agreement that the Customs Service recently reached with Canada. Such a system requires analysis of the shipment information in advance of loading and possession of the capability to inspect any container the government chooses to inspect. It also requires the government to establish with clarity who has responsibility for containerized cargo security.

Today, Customs handles the “trade” aspects of these international cargo movements, and the Commissioner of Customs has actively embarked upon the development of two container security programs -- a Container Security Initiative (CSI) and the Customs Trade Partnership Against Terrorism (C-TPAT). Ocean carriers are working with the agency in these efforts. But what agency is responsible for managing the trade consequences should there be an incident? If we are ever faced with a terrorist use of a container, what agency is responsible for determining what is done to keep international trade flowing? Customs Commissioner Bonner has indicated, as have Coast Guard officials, that the U.S. government response, presumably led by the Coast Guard, could well be to close U.S. ports. What would be required to reopen them and who would make the decision to do so? What would carriers, shippers, terminal operators and ports have to do to keep American trade flowing? What would the U.S. expect foreign ports to do, and what capabilities would we expect or require of them? When will those expectations and requirements be communicated to the relevant foreign governments and to the industry? We believe that these questions remain unanswered.

There is on average over \$1.3 billion worth of American exports and imports moving in and out of our ports in containers every day. That flow of goods, often moving as part of a “just in time” supply chain, keeps countless factories operating and millions of Americans employed. It does the same in the economies of all our trading partners. Its efficiency is essential to the global economy. Accordingly, it is essential that the United States government clarify which agency is responsible for the issues involving the security of international containerized cargo shipments. Let me provide a few examples of the confusion.

First, as discussed above, consider the issue of obtaining advance information for prescreening containerized shipments before they are loaded aboard vessels bound for the U.S.. Today, there is no system in place to do this. The Senate has passed legislation that would give the Customs Service authority to do this by expanding their existing programs – more specifically, it authorizes Customs to require carriers to file their cargo manifests earlier than today, perhaps before loading the ship. The House is considering legislation that would give the DOT the authority to do this by establishing a new program to be developed within the Transportation Security Administration. While previously endorsing S.1214, the Administration

has not yet expressed a preference between these approaches. In short, the government has not yet defined its information requirements – what information does it want, from whom, when? This is essential.

Second, consider the negotiations with foreign ports and governments that will be so essential to effectively implementing an extended security program. The Coast Guard has done an outstanding job at the IMO to address vessel security issue. This is due, not only to the Coast Guard's performance, but because it is clear the Coast Guard is the responsible U.S. government agency for vessel security issues. On container security and port security, who speaks for the United States? Commissioner Bonner has undertaken his Container Security Initiative in an effort to negotiate arrangements with foreign ports and governments on container security, as he has successfully done with Canada. The "Patriot" legislation creating the Transportation Security Administration provides TSA sufficiently sweeping authority that this agency may want to address this issue. The Coast Guard has raised container and port security issues with our trading partners at the IMO. Unless the Administration makes it clear who is responsible for container security issues, U.S. initiatives will be undermined by the lack of a single vision and by unavoidable confusion within foreign governments about who speaks for the United States.

Third, which agency is responsible for managing what carriers, marine terminal operators, ports, shippers, freight forwarder and brokers will have to do if our nation ever has to manage the continuation of international commerce after a terrorist incident involving a container? Logically, it should be the agency designing how to secure and manage that system in the first place. The potential economic damage from the United States imposing in effect a "blockade" on itself as a response would be so enormous, that it is imperative that the government address not only what is needed to detect and prevent the threat – which is critically important, but how it would keep such an attack from accomplishing its potential objective, namely crippling the economy. Clear responsibility for this issue and the planning that is required is lacking today.

The time to address and resolve these issues is now. The Department of Transportation is creating a new component of the Transportation Security Administration with a new Undersecretary for maritime and land security. The roles of TSA, the Coast Guard and the Customs Service need to be established clearly and authoritatively. The issue and its consequences are too serious to do otherwise.

- 2. Second, there should be clear, mandatory rules informing each responsible person in the transportation chain what is required of them.*

We believe the government should establish clear minimum requirements, with clear accountabilities assigned to the appropriate parties, and should enforce those requirements uniformly.

- 3. Third, the security regime must allow for the continued free and efficient flow of trade.*

The liner industry is moving over a million containers of American import and export cargo a month. Supply chain management techniques applied to this trade have provided

literally billions of dollars of savings to American businesses and consumers, as well as efficiently connecting the American economy to every market in the world. Efficient transportation and secure transportation are not incompatible, and the legislative and regulatory responses should strive to preserve the benefits of an efficient, reliable transportation system, and not add unnecessary costs.

4. *Fourth, international cooperation is necessary to effectively and comprehensively extend enhanced security to international supply chains.*

This is a task that requires U.S. leadership because America is the largest trading nation in the world; however, the United States government cannot extend security to foreign ports and places without other nations' engagement and agreement. The Coast Guard has done an outstanding job of getting the IMO to deal with many of the issues involved, especially those involving ships and ships' interface with the landside terminals. That same kind of initiative needs to be taken with our trading partners to address the remainder of the issue of establishing an effective system to prescreen and, if deemed necessary, check containers before they are loaded onto ships.

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The members of the World Shipping Council transport over two-thirds of the value of all of America's oceanborne commerce and are ready and willing to help the government in its efforts against terrorism. A safe, efficient and reliable transportation system is essential to our country's prosperity and to the prosperity of all of our trading partners. I would like to thank the sponsors and organizers of this Conference for doing what they can to focus attention on this very important issue. The problems are complex and difficult. The people in the government and the industry want to do the right thing and address the issue effectively. As Admiral Loy said, however, we need to "get on with the job of getting it done."

Appendix A

World Shipping Council Member Lines

APL

A.P. Moller-Maersk Sealand
(including Safmarine)

Atlantic Container Line (ACL)

CP Ships

(including Canada Maritime, CAST, Lykes Lines, Contship
Containerlines, TMM Lines, and ANZDL)

China Ocean Shipping Company (COSCO)

China Shipping Group

CMA-CGM Group

Compania Sud-Americana de Vapores (CSAV)

Crowley Maritime Corporation

Evergreen Marine Corporation

(including Lloyd Triestino)

Gearbulk Ltd.

Great White Fleet

Hamburg Sud

(including Columbus Line and Alianca)

Hanjin Shipping Company

Hapag-Lloyd Container Line

HUAL

Hyundai Merchant Marine Company

Italia Line

Kawasaki Kisen Kaisha Ltd. (K Line)

Malaysia International Shipping Corporation (MISC)

Mediterranean Shipping Company

Mitsui O.S.K. Lines

NYK Line

Orient Overseas Container Line, Ltd. (OOCL)

P&O Nedlloyd Limited

(including Farrell Lines)

Torm Lines

United Arab Shipping Company

Wan Hai Lines Ltd.

Wallenius Wilhelmsen Lines

Yangming Marine Transport Corporation

Zim Israel Navigation Company