Comments of the

World Shipping Council

Submitted to the

United States Coast Guard
Department of Homeland Security

In the matter of

Notice of Proposed Rulemaking

Ballast Water Management Reporting and Recordkeeping

Docket Number:
USCG-2012-0924
RIN 1625-AB68

August 5, 2013
The World Shipping Council (WSC) is a non-profit trade association that represents over twenty-nine liner shipping\(^1\) companies that carry approximately 90% of U.S. international containerized trade. WSC’s member companies operate over 1,500 ocean-going liner vessels, mostly containerships, which make more than 27,000 calls at ports in the United States each year.

WSC respectfully files the following brief comments in response to the United States Coast Guard’s (USCG) Notice of Proposed Rule Making (NPRM) published on June 5, 2013 (78 Fed. Reg. 33774), which invites public comment on proposed changes to vessel ballast water management reporting and recordkeeping requirements:

1. **Post-Arrival Submission of Ballast Water Management (BWM) Reports**

   The NPRM proposes to change the BWM report submission deadline from 24 hours prior to arrival (or, for voyages less than 24 hours, prior to departure from the previous port) to no later than six hours after arrival or prior to departure from the destination port, whichever is earlier.

   WSC supports this logical and helpful proposed change, which will reduce the number of BWM amendment reports submitted by vessels and will improve the accuracy of BWM reports because they will be based on actual events and not estimates of BWM activity.

2. **Format and Submission of BWM Reports**

   The NPRM proposes to improve and standardize the format of the electronic BWM report form and to encourage electronic submission of BWM reports to the National Ballast Information Clearinghouse (NBIC), which collects and processes the reports.

   WSC concurs with these proposed changes and commends the USCG for working to eliminate anachronistic and inefficient paper BWM form submissions to the NBIC.

3. **Electronic Signatures**

   We note that proposed § 151.2070(a)(6) would require the responsible officer’s signature on the submitted BWM report form. Although the NBIC’s online and email BWM report forms already (and appropriately) allow responsible officers to sign the

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\(^1\) Liner vessels operate on fixed schedules among pre-determined ports. The Council’s member lines operate containerships, roll-on/roll-off, and car carrier vessels. A list of the Council’s members may be found at [www.worldshipping.org](http://www.worldshipping.org).
forms electronically, the regulations make no mention of electronic signatures. We therefore recommend that the proposed regulations be amended to require the responsible officer’s signature or electronic signature on the form.

4. Conclusion

WSC and our member companies support the USCG’s ballast water management program and wish to commend the USCG for taking steps to update and improve the BWM reporting and recordkeeping processes.