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Sayı
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Konu
Subject :**Amerika Deniz Ticaret Odası Eylül 2015 Raporu Hk.**

Sirküler No: 727/ 2015

Sayın Üyemiz,

İlgi: Uluslararası Deniz Ticaret Odası'ndan (ICS) alınan 06.10.2015 tarih ve ICS(15)45 sayılı yazı ve Eki.

Amerika Deniz Ticaret Odası'ndan (Chamber of Shipping of America - CSA) alınan, yazı Ekindeki raporda, **Amerika Birleşik Devletleri Sahil Güvenlik Komutanlığı'nın (USCG), gemilerin balast suyu yönetimi uygulama süresinin uzatılması taleplerinin USCG'a bildirilmesi usulüne ilişkin 13-01 sayılı Politika Belgesini revize ettiği bildirilmektedir.** Belgedeki temel değişiklikler özetle aşağıdaki gibidir:

- Dönüşümlü Yönetim Sistemi'ni (Alternate Management System) kurmuş olan gemiler için süre uzatımı talebi yapılabilir. İki program birbirlerinden açıkça farklıdır ve eğer bir gemi uzatma aldıysa AMS kullanmak zorunda değildir.
- Önceki politika belgesi, müsaade edilebilir maksimum (asıl ve ilave) uzatma süresini 5 yıllık bir zaman dilimiyle sınırlamıştı. Revizyonla birlikte bu sınırlama kalkmıştır.
- Revizyon başvuruyu ve belge gerekliliklerini basitleştirmekte ve benzer gemiler için toplu başvuruları mümkün kılmaktadır.
- Uzatma talebi yapılırken Balast Suyu Yönetimi Planı'nın bir kopyası artık istenmemektedir. Uzatma talebini ibraz edenin, bir planın var olduğuna ve geminin ABD sularında gerçekleşen tüm balast suyu boşaltımlarında bu plana sadık kalacağına dair bir beyanı dahil etmesi yeterlidir.
- Süre uzatımı talebinin, Excel elektronik çizelgesinin doldurulmuş bir versiyonu ile birlikte elektronik olarak environmental_standards@uscg.mil adresine gönderilmesi istenmektedir.
- Politika Belgesine ek uzatma taleplerini ele alan yeni bir bölüm ilave edilmiştir (bölüm 5(b)).

Bilgilerinizi arz ve rica ederiz.

Saygılarımızla,

Murat TUNCER
Genel Sekreter**EKLER:**

Ek-1: İlgi yazı ve Eki

DAĞITIM:**Gereği:**

- Tüm Üyelerimiz (Web Sayfasında)
- Türk Armatörler Birliği
- S/S Gemi Armatörleri Motorlu Taş. Koop.
- Vapur Donatanları ve Acenteleri Derneği
- 22,24,25,27,28,29 No.'lu Meslek Komite Bkş.
- İMEAK DTO Şubeleri
- Türk Uzakyol Gemi Kaptanları Derneği
- Gemi Sahibi Firmalar

Bilgi:

- Ulaştırma, Denizcilik ve Haberleşme Bakanlığı
Deniz ve İçsular Düzenleme Genel Müdürlüğü
- Sn. Sefer KALKAVAN
TOBB DTO'ları Konsej Başkanı
- Meclis Başkanlık Divanı
- Yönetim Kurulu Başkanı ve Üyeleri
- Sn. Erol YÜCEL
TOBB Türkiye Denizcilik Meclisi Bşk.

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6 October 2015

ICS(15)45

TO: ALL FULL AND ASSOCIATE MEMBERS

**Copy: Shipping Policy Committee
Marine Committee
Construction & Equipment Sub-Committee**

US DEVELOPMENTS – SEPTEMBER 2015

Action required: To note the attached report from the Chamber of Shipping of America (CSA).

Attached at **Annex A**, please find the monthly report from CSA for September 2015.

The report contains:

1. News that the USCG has revised its Policy Letter (No. 13-01) on the format for submission of vessel extension requests from the USCG ballast water management implementation schedule. CSA kindly provides a summary of the key changes and a link to the relevant USCG webpage.
2. News that CSA recently attended a meeting of the Cotton Club (the Washington-based maritime attachés of Consultative Shipping Group governments), during which it briefed the Club on a range of maritime and trade policy issues.
3. A summary of a recent CSA meeting with the Senate Commerce Committee staff, during which the progress of the Vessel Incidental Discharge Act (VIDA) was discussed.
4. A description of the Stakeholder Liaison Committee for the Mid-Atlantic Regional Council on the Ocean (MARCO), on which CSA has been invited to sit. The MARCO is tasked with supporting the development of a regional ocean planning progress called for under the National Ocean Policy.
5. News that CSA recently attending a meeting of the MARCO in order to help inform its Regional Planning Body.

Joe Francombe
Senior Adviser



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September 2015 Report for ICS

Reader Note:

- 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 Policy Letter "Extensions of Implementation Schedule for Approved Ballast Water Management Methods

(Published as CG-OES Policy Letter 13-01 (Rev1) on 10 Sept 2015)

The USCG has revised its Policy Letter No. 13-01 which outlines the requirements and formats for submission of vessel extension requests to the ballast water management implementation schedule found in current USCG regulations. In particular, this revision makes certain clarifications in the old policy letter and provides greater direction as to the formats to be used for extension requests. The above hot link will take you directly to the USCG webpage and will enable downloads of the revised policy letter as well as a "tips for submission" document and an excel spreadsheet document which should be used as the format for vessel extension requests.

In particular, the changes from the original policy letter include:

- Clarification that an extension request may be made for vessels that have installed an Alternate Management System. The two programs are distinctly separate and as a practical matter, the AMS does not have to be used if the vessel as received an extension.
- The old policy letter limited the maximum time allowable for extensions (original and supplemental) to a 5 year period. This revision removes that limitation. This change is of interest in that it signals the recognition by the USCG that extension criteria are likely to be met for periods in excess of 5 years e.g. US type approvals, fit for purpose for particular vessel, availability of system, availability of shipyard.



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- Simplifies the application and document requirements and enables batch applications for similar vessels.
- No longer requires that a copy of the Ballast Water Management Plan be included with the request for extension. The submitter need only include a statement that the plan exists and will be followed by the vessel for all ballast water discharges occurring in US waters.
- Requires extension request be submitted electronically including a completed version of the Excel spreadsheet; requests are to be submitted to environmental_standards@uscg.mil
- A new section addressing supplemental extension requests has been added to the policy letter at section 5(b). This process vastly streamlines the supplemental extension request process and eliminates the need to resubmit information submitted with the original extension request providing the information has not changed.

A copy of the new policy letter and supporting documents including tips for extension application and the formatted Excel spreadsheet may be downloaded at:

https://homeport.uscg.mil/mycg/portal/ep/contentView.do?contentTypeld=2&channelld=-18366&contentld=466465&programld=13065&programPage=%2Fep%2Fprogram%2Feditorial.jsp&pageTypeld=13489&BV_SessionID=@@@@1545827067.1443187124@@@@&BV_EngineID=ccccadghekegicfngcfcfmdfhdfgl.0

CSA Meeting with The Cotton Club

At the invitation of the Cotton Club, CSA staff attended their regular meeting in late September to discuss issues of mutual interest. CSA briefed the Club on ballast water management (IMO and US issues), air emissions including ECA compliance history, fuel oil availability concerns in 2020 with the imposition of the 0.5 global cap, greenhouse gas/CO2 emissions given the upcoming COP 21 in Paris and the need for reduction of these emissions to be left in the hands of IMO, energy export legislation in the US including LNG and crude oil exports, and hull biofouling initiatives.

CSA Meeting Senate Commerce Committee Staff

CSA staff was invited to meet with Senate Commerce Committee staff to discuss areas of interest/concern for the remainder of the current Congress and the next



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Congress which will be called to order in January 2017. CSA's major point of focus was on the Vessel Incidental Discharge Act (VIDA) which has been passed out of Committee and is now awaiting schedule of floor action and vote. It was noted by staff that these provisions have become a new section in the USCG Authorization Act and in an ideal situation, would be moved as part of that legislation. However, staff indicated that there continue to exist problems with certain Members of the Senate relative to the preemption language and that the full bill would not be allowed to be held hostage but for the inclusion of the VIDA provisions. It is possible that the proponents of the consolidated bill may be force to remove the VIDA text from the CG Authorization Act and thus a search for another legislative vehicle would be required. CSA noted that we are committed to assist in the movement of the VIDA provisions to a floor vote in any legislative vehicle available and as part of that commitment, have and will continue to meet with key Members to promote support for VIDA.

CSA invited to sit on the Stakeholder Liaison Committee for Mid-Atlantic Regional Council on the Ocean (MARCO)

The Stakeholder Liaison Committee SLC serves as an important forum for stakeholder leaders in the Mid-Atlantic to provide direct input into the regional ocean planning process. In addition, committee members serve as conduits for information between stakeholder constituents and regional ocean planning efforts, and engage in dialogue among stakeholder leaders across the region to identify shared interests in the use and conservation of Mid-Atlantic ocean resources.

The major present focus of work is in support of a regional ocean planning process called for under the National Ocean Policy. On request of the White House, the timeline to deliver a final Regional Ocean Action Plan is 2016.

Mid-Atlantic Regional Ocean Planning Body and Stakeholder Meetings

CSA's attendance was an opportunity to engage on data, information, and draft interjurisdictional coordination (IJC) actions to understand and influence Mid-Atlantic regional ocean planning and inform the Mid-Atlantic Regional Planning Body accordingly. It is important that CSA represent our member's interests early on in this process to ensure the National Ocean Plan understands and accounts for the needs of our industry in a smart, efficient and reasonable manner.