



ANNUAL ISSUES REPORT

SEPTEMBER 1, 2024

<u>Activity on legislation and regulatory proposals:</u> CSA acted on international and domestic legislation and regulatory actions during the past year in the following areas:

Impacts of the Russian/Ukraine Conflict on the Global Maritime Industry

The Russian/Ukraine conflict presented (and continues to present) challenging issues for the global maritime industry, including impacts on mariners in and from the affected regions, global and national sanctions programs which changed literally day to day, navigational safety in the region and disruption of international trading patterns to and from the region. Relative to mariners and acknowledging that a significant number of Russian and Ukrainian seafarers are used on vessels from a number of flag registries, questions arose as to whether these seafarers would be caught in the various sanctions programs prohibiting the use of Russian and Ukrainian physical and human assets. Clearly certain cargoes from Russia were prohibited from offloading the countries imposing the sanctions packages as were vessels flagged in Russia, but it was initially unclear whether similar restrictions would be applied to Russian and Ukrainian mariners. The general conclusion now confirmed by a number of countries, including the US, is that the various sanction packages were not intended to apply to citizens of these countries working outside the region including mariners on vessels flagged in other nations. CSA worked with the US State Department and the US Treasury's Office of Foreign Asset Control (OFAC) to successfully advocate for the issuance of a general license confirming that Russian and Ukrainian seafarers serving on vessels calling in US ports were not to be included in the US sanctions package. As the conflict continued, CSA collaborated with international colleagues and members to assure the most current information was made available to the industry so that some level of certainty could be provided for a range of trading scenarios.

CSA participated and continues to participate in a weekly ICS call where ICS members provided updates on new sanctions being imposed by individual nations as well as the European Union sanctions packages. In the US, it was noted that historically sanctions violations determinations are very case specific and there is little opportunity to create generic rules applying to all situations. With this in mind, CSA advised that OFAC will work directly with business entities in assessing the legality of business operations and how/if they may violate US sanctions provisions. Companies that have concerns in this respect can contact OFAC in advance to receive a determination on a specific business case relative whether it potentially could result in an adverse finding by OFAC. CSA also provided information and contact points within the US government where updated information can be reviewed.

Impacts of the Israeli/Hamas conflict on the Global Maritime Industry

The Israeli/Hamas conflict unfolding during the past year in the Eastern Mediterranean, the Red Sea and the Gulf of Aden presented (and continues to present) serious and challenging issues for the global maritime industry, including impacts on vessels transiting through these areas as regards navigational



safety, impacts on vessel crews and disruption of international trading patterns to and from the region. The security situation remains severe with continuing attacks on commercial shipping by the Houthi militia in Yemen. The risk level is further increased with the potential for a major regional war between Israel, Iran, and its Hezbollah proxies in Lebanon. Reports show that transits through the Red Sea/Suez Canal are currently 60% lower than normal. A number of vessels have been attacked and in some cases these attacks have resulted in damage to the vessel (fire), injuries to the crew and environmental impact where spills have occurred due to the damage. In the worst cases, several instances have occurred where the vessel has been hijacked and crews held hostage. The crisis is expected to last as long as Israel's campaign in Gaza continues.

CSA participates in weekly calls hosted by ICS to ensure the most current information is shared among ICS members. ICS continues to lead efforts to develop guidance on supporting seafarers and highlight the scale of the crisis with the media. ICS also maintains close liaison with military forces deployed in the region with a focus on the US led Operation Prosperity Guardian and the EU Operations Aspides exchanging information on the ongoing threat and increasing awareness of the needs of the industry and seafarers in the impacted areas.

International Activities

IMO Marine Environment Protection Committee (MEPC)/Maritime Safety Committee (MSC) – CSA continued its active involvement in a multitude of issues being addressed at IMO via its attendance at key meetings as a member of the ICS delegation. CSA was actively involved and provided recommendations to ICS which were incorporated into ICS positions presented at these meetings. CSA is a member of the ICS Board of Directors with Cole Cosgrove (Crowley/Fairwater) the primary representative and Kathy Metcalf as the alternate representative. CSA also serves on the ICS Shipping Policy Committee, Maritime Law Committee, Marine Committee, and the internal ICS working groups on medium and long term measures, including the development of a maritime GHG emissions pricing mechanism and a goal-based fuel standard. This participation provides us the opportunity to ensure the positions of CSA members are incorporated into ICS position development and ultimately presented to the IMO MEPC and MSC as an ICS submission. CSA is also participating in the multi-meeting schedule of the Intersessional Working Group on Greenhouse Gas Emissions as a member of the ICS delegation. Key issues addressed within the IMO structure include implementation of the EU Emissions Trading System, development of short, medium and long term measures related to the IMO greenhouse gas strategy, identification of alternative fuels (low and zero carbon), underwater radiated noise, exhaust gas scrubber discharges, cybersecurity, piracy, maritime security, ongoing review of the STCW Convention, development of criteria for use of autonomous vessels, safety/carriage issues associated with the use of future lo/zero carbon fuels and ballast water management implementation issues including the issues associated with ballast water management in ports with challenging water quality conditions.

<u>ILO Initiatives</u> - CSA continued monitoring developments regarding the Maritime Labor Convention (MLC) implementation and US accession to this treaty. Consistent with our role with ICS and ILO, CSA continues to stress that the issue of women in the seafaring population should



actually be expanded to diversity in the maritime workplace, both ashore and afloat, given that gender is but one aspect of diversity in the workforce. CSA also interfaced with ILO via our participation on ICS delegations regarding the projected shortage of seafarers and with regard to the ongoing review of the STCW Convention which is focused on assessing additional and/or new skill sets which will be needed by the mariner of the future.

US Executive and Legislative Branch Activities

- US National Maritime Strategy over the past decades, the US has experienced a significant reduction in the number of US flag vessels trading internationally as well as a significant reduction in US shipbuilding and repair capacity regarding both military and commercial vessels These reductions are seen as a serious threat not only to the viability of the US flagged commercial maritime fleet but also to the ability of the US flag fleet to meet the needs of the US military sealift capacity should a forward deployment of military resources be needed. In addition, issues associated with mariner shortage/recruitment/retention have resulted in increasing concerns about the current shortage of US mariners to adequately crew US flag vessels if the US flag international trading fleet were increased to levels necessary to meet both economic and military needs. Under the leadership of MARAD, the US executive branch agencies are near completion of a National Maritime Strategy to address these concerns. Also given the awareness of certain Members of Congress on these issues, CSA has been engaged with Congressional staff on what, if any, legislative action would be required to address these concerns. We expect comprehensive legislation to be introduced before year-end which will (1) establish national oversight and consistent funding for the US maritime industry, (2) provide support and incentive programs to promote an increase of US flag vessels in international trade, (3) provide support to the US shipbuilding industry, and (4) expand and strengthen maritime workforce development to boost mariner and shipyard worker recruitment, training and retention. A workshop hosted by ABS, in which CSA will participate, is scheduled for Fall 2024 with representatives from the shipping and shipbuilding industry, maritime labor, the Executive Branch, and representatives from a number of Members of Congress.
- <u>US Trade Act Section 301 Petition Against China's Shipbuilding Industry</u> the US labor unions have filed a petition to the US Trade Representative (USTR) alleging unfair practices by China in the maritime, logistics and shipbuilding sectors, arguing that the actions by China are a factor in the decline of the US flag and shipbuilding industry. The petitioners requested remedial measures, the most troublesome being the proposed levy of a port fee on any vessel calling in a US port that was built in China, regardless of the nationality of the current owner or the registry. The USTR has conducted an investigation into the claims made in the petition but has restricted the terms of reference of the investigation to assessing the validity of these claims and will not include an evaluation of the proposed remedial measures as requested in the petition. The next expected action is publication of the USTR findings and if they find substance to the allegations, USTR will commence evaluating possible remedies.



- The Biden Administration and Implications on Maritime Trade and Transportation following the initial flurry of over 40 Presidential executive orders in January 2021, the Administration has more fully developed programs relating to maritime trade, marine operations in US waters, a number of initiatives attempting to implement the "Buy American" program outlined by the White House and a number of discussions relating to reinvigorating the US flag fleet and addressing the current shortage, recruitment and retention of US mariners. Brief details of these initiatives are found below:
 - 1) <u>US Coast Guard Authorization Act of 2024</u> omnibus legislation with numerous provisions which has been passed by the House and is now in the Senate awaiting further action. The Senate is currently negotiating their version which is expected to be introduced shortly. Historically, there is a House and Senate version of the USCG authorization act which have differences in content and will likely go to a conference committee for resolution of the differences.
 - 2) American Offshore Workers Fairness Act bills were introduced in both the House and Senate which would require mariners on foreign-flagged vessels working on the Outer Continental Shelf to be either US citizens or citizens of the nation in which the vessel is flagged. Currently this issue is included in the USCG Authorization Act of 2024.
 - 3) Ocean Shipping Reform Implementation Act introduced in 2023, this bill has passed the House and is awaiting action in the Senate. This bill would provide additional powers to the Federal Maritime Commission to regulate technology and anticompetitive practices and further modifies the Commission's powers to accept and investigate complaints concerning alleged anticompetitive practices by registered shipping exchanges. The bill also prohibits grants issued to a grant applicant using China's logistics platform (LOGINK) or transportation logistics software controlled by a foreign adversary. The bill also establishes a National Port Advisory Committee and a National Ocean Carrier Advisory Committee which in conjunction with the existing National Shipper Advisory Committee, will advise the Commission on policies relating to competitiveness, reliability, and efficiency in the ocean freight delivery system.
 - 4) American Port Access Privileges Act this bill requires port authorities that receive federal funding to provide preferential berthing for certain vessels including US flag vessels, vessels with a coastwise endorsement, vessels participating in the Maritime Security Program, the Emergency Preparedness Program, the Cable Security Fleet, the National Defense Reserve Fleet, the Tanker Security Fleet and vessels of any flag calling at more than 1 US port before calling on a foreign port. Preference is also given to vessels that have certified cargo bookings of US exports that are estimated to weigh no less than 51% of the vessels total carrying capacity or equivalent to 51% of the vessel's total carrying capacity of 20 foot equivalent units. Contents of this bill may be included in the USCG Authorization Act of 2024.



- 5) Clean Shipping Act of 2022 this bill would set progressively more stringent greenhouse gas fuel standards using a carbon intensity baseline for 2024 ranging from a 20% reduction in 2027-2029, 45% in 2030-2034, 80% in 2035-2039 and 100% in 2040 which would be applied to most vessels trading in US ports regardless of flag. The provisions of this bill mirror similar ongoing discussions at IMO. The bill would also establish in-port marine vessel zero emission standards no later than January 1, 2030.
- 6) Justice for Victims of Foreign Vessel Accidents Act this bill includes a proposal to increase the liability for non-US flagged vessels in US waters up to 10 times the current liability cap. The current liability cap for US flag vessels would remain unchanged. This bill was introduced as a direct result of the Baltimore Key Bridge incident which is currently estimated in the billions of US dollars to repair and rebuild. The text of this bill is also included in the current unintroduced text of the National Maritime Strategy bill (Kelly/Waltz).
- 7) Energizing American Shipbuilding Act of 2023 introduced in the Senate in late 2023, this bill would require US built, US flag vessels to transport a certain percentage of US LNG and crude oil exports with increasing percentages through the next two decades.
- 8) Renewable Fuel for Ocean Going Vessels Act introduced in the House in late 2023, this bill would add "fuel for ocean-going vessels" to the current qualifying fuels used for home heating oil and jet fuel to the EPA Renewable Fuel Standard (RFS).
- 9) International Maritime Pollution Accountability Act introduced in mid-2023, this bill would impose a "pollution fee" of \$150 per ton of carbon emissions from fuel burned on the inbound transit for vessels calling at US ports as well as additional fees for nitrogen oxide at \$6.30 per pound, sulfur dioxide at \$18 per pound and particulate matter 2.5 at \$38.90 per pound. These requirements would sunset if the IMO implements a program that is equal to or greater than the amounts proposed in this bill.
- 10) Ocean Shipping Antitrust Enforcement Act introduced in mid-2023, this bill applies US federal antitrust laws to ocean common carriers but permits continuation of the current exemption for assessment agreements involving collectively bargained benefits. It also authorizes the Federal Maritime Commission to comment on mergers and acquisitions of common carriers and marine terminal operators that are under review by the US Justice Department's Antitrust Division.



- 11) <u>Stop Harboring Iranian Petroleum (SHIP) Act</u> introduced in mid-2023, this bill requires the President to impose visa and property blocking sanctions against foreign persons or entities that knowingly transport, process, refine, or otherwise deal in petroleum and petroleum products (including petrochemicals) originating in Iran.
- US Reinstatement of Sanctions Against Iran and others –Noting the legal and political complexities associated with this initiation of new and reinstatement of existing sanctions, CSA will continued to monitor US activities particularly noting that OFAC review of foreign transactions can be conducted at least five transactions deep to determine if a particular entity has violated these sanctions which provides a unique challenge given the inability to assess third party transactions to which the vessel owner is not a party. CSA also continues to monitor existing sanctions packages applicable to North Korea, Syria and others.
- National Ocean Policy/Marine Spatial Planning CSA continues to engage actively in ocean policy and marine spatial planning from various angles to ensure the commercial shipping interests of our members are at the forefront. We have presented at several engagements on this issue at the Federal and State level. Additionally, we engage and provide feedback on wind energy areas off New York, New Jersey, North Carolina, Virginia, Gulf Coast, California, and Oregon, to name a few. CSA serves on the New York Maritime Technical Work Group (M-TWG) to identify "Key Issues and Trends" for the Maritime Sector related to offshore wind, inform research needed on maritime and offshore wind issues and help shape offshore wind best management practices. As ocean users and their footprint continue to expand, it is imperative we ensure commercial ships have the necessary space to operate and navigate.
- Coast Guard Type Approval Program for Ballast Water Management Systems and Alignment with IMO Ballast Water Convention Requirements – CSA continues to interface with USCG on the status of their type approval process for ballast water management systems ensuring the USCG fully understands the urgency in approving properly tested systems through the type approval process. Concern still exists as to the suitability of use of these systems on certain vessel types and US flag vessels, where the US design and construction requirements are more stringent than those contained in SOLAS. CSA continues to work toward alignment of the US requirements with the IMO Ballast Water Convention requirements including implementation and enforcement issues. Given the current USCG position on a number of alignment issues, CSA work has focused on supporting US recommended changes to the Convention in order to more closely align the Convention with the US requirements, most specifically in light of new data being collected under the IMO Experience Building Phase. Additional issues being addressed include the development of the IMO contingency measures and advocacy efforts to urge USCG's acceptance of a testing methodology which is based on the viability/nonviability criteria (recently refused based on USCG determination of nonavailability of a testing protocol based on these criteria), and assistance in member specific compliance cases.
- Maritime Cybersecurity Strategy/IMO Cybersecurity Initiatives Maritime cybersecurity
 continues to be a main focus of CSA for members and staff. The USCG released a Notice of
 Proposed Rulemaking (NPRM) to add regulations for cybersecurity requirements for U.S.-flagged



vessels, Outer Continental Shelf facilities, and U.S. facilities subject to the Maritime Transportation Security Act of 2002 as subpart F to 33 CFR 101. CSA met with several member companies and industry groups to produce and post comments to the Federal docket in response to the USCG NPRM. CSA has been engaged in development of the White House's National Maritime Cybersecurity Plan, USCG's Cyber Strategic Outlook in respect to commercial cargo vessels digital security and the Atlantic Council's Cyber Statecraft Initiative. CSA cofounded and facilitates a shipowner/operator initiative to share cyber information in a trusted and secure environment through an online platform and routine group engagements. Internationally, CSA worked on the original Industry Guidelines on Cyber Security Onboard Ships led by BIMCO and has continued this effort through each iteration including our recent work with the completion of version 5. Drafts were provided to members throughout the process and member feedback was incorporated. We also engage in cyber working groups at IMO's Maritime Safety Committee and analyze member nation and NGO submissions including the revision of IMO's Guidelines on Maritime Cyber Risk Management.

- Executive Order on Amending Regulations Relating to the Safeguarding of Vessels, Harbors, Ports, and Waterfront Facilities of the United States - Members were briefed and provided comments on the Administration's Executive Order (EO) providing the USCG direct authority to control facility or vessel operations to now include cybersecurity, requiring reporting of an actual or threatened cyber incident, and other provisions. The EO amends federal regulations and provides a Coast Guard captain of the port with clear and broader authorities to address maritime cyber threats granted to them by the Administration through this EO. To that effect, the EO was quickly followed by USCG's release of NVIC 02-24 to provide necessary guidance for reporting as some confusion existed due to overlap and specific incident reporting. For example, in addition to the National Response Center, incidents with "evidence of sabotage, subversive activity, or an actual or threatened cyber incident involving or endangering any vessel, harbor, port, or waterfront facility, including any data, information, network, program, system, or other digital infrastructure thereon or therein, shall be reported immediately to the FBI, CISA, and to the COTP." It is also noted that routine spam, phishing attempts, and other nuisance events that do not breach a system's defenses may not need to be reported as cyber incidents along with accidental violations of acceptable use policies, such as plugging in an unauthorized USB drive, which are not considered a reportable cyber incident.
- California Shore Power Initiative/Ocean-Going Vessel at Berth Regulations CSA continues to monitor and provide input on the expansion of the current shore power initiatives from the current program (applicable to container ships) to other ship types including tankers and bulk carriers. The most significant recent development is the release of a DNV study commissioned by the Western States Petroleum Association which performed technology assessment as to whether safe and reliable emissions control technologies can be designed for tank vessels. The study determined that (1) tanker shore power technology needs significant development and risk mitigation before industry-wide implementation for tankers operating world-wide (2) emissions capture and control technology for tankers does not currently exist (3) the current regulatory timeline as contained in the CARB regulations is insufficient to address and mitigate the outstanding safety and operational risk and (4) low or zero carbon fuels may significantly reduce the long-term value of investments for at-berth emissions management.



- Vessel General Permit (VGP)/EPA Regulations Implementing VIDA Noting that VIDA required EPA to promulgate regulations implementing the act by December 2020 which would be followed by a USCG rulemaking to be completed 2 years after EPA's regulations were finalized, EPA has still not finalized their regulations. The final EPA regulation is expected to be published in September 2024. CSA submitted extensive comments on this proposed rule. Based on conversations with EPA, it appears that the delay is a result of extensive EPA/state consultations on the provisions of the EPA proposed regulations in mid-2020 where it is believed that environmental NGOs and state environmental agencies are advocating for more stringent standards than those in the proposed rule specifically relating to ballast water, hull fouling, exhaust gas scrubber discharges and graywater. EPA conducted a listening session in late 2021 to hear industry's concerns with comments made by CSA, CLIA and the Lake Carriers Association with an emphasis on alignment of the US requirements with existing IMO conventions. In July 2023, EPA amended its regulatory agenda to reflect their new projection that their final regulations would be published no later than November 2024.
- North Atlantic Right Whale Vessel Strike Reduction Regulation Amendments following a lengthy assessment of North Atlantic Right Whale population levels and an analysis of over 10 years of ship strike incidents, NOAA has proposed new regulations to reduce the risk of ship strikes with significant impact on the marine industry. The new proposed regulations would (1) significantly expand the current seasonal management areas (now called seasonal speed zones) where speed restrictions are mandatory (2) modifies the current dynamic management areas (now called dynamic speed zones) to mandate speed restrictions in these areas (previously they were recommended speed restrictions) (3) increase the scope of vessels covered from the current 65 feet and over to 35 feet an over and (4) modifies the current speed deviation safety exceptions to require additional information on why a vessel was required to exceed the 10 knot restriction, enter this information in the deck log (currently required) and submit a report to an as yet to be established NOAA website. CSA has prepared an analysis of the proposal and has submitted comments opposing the significant expansion of the seasonal areas and provided alternative solutions to be considered by NOAA. Due to concerns by Members of Congress on the potential impacts of this proposed regulation, finalization of the rulemaking has been delayed to a date uncertain.
- US Regulations Implementing MARPOL Annex VI Amendments, including Chapter 4 (Energy Efficiency Measures for Existing Ships and Carbon Intensity for International Shipping) USCG is proceeding with a regulatory project which will implement the provisions of the new Annex VI amendments into US law. Recent developments include a USCG notice regarding application of MARPOL Annex VI, Chapter 4. These amendments include energy efficiency measures for existing ships and carbon intensity for international shipping by focusing on goal-based (performance based) technical and operational measures to reduce the operational carbon intensity of international vessels. The US Coast Guard is in process of amending the Code of Federal Regulations to implement the provisions of MARPOL Annex VI with the final regulation clarifying the application of Annex VI regulations and identifying areas where discretionary provisions of Annex VI may be adopted and specify procedures/criteria to address any gaps in the current US regulations. Of note as explained in a recently published article in the USCG Maritime Commons



(blog), the USCG informs owners and operators of US flag vessels of the applicability of the Annex VI/Chapter 4 provisions. Specifically, owners and operators of US flagged vessels that engage in voyages into waters subject to the jurisdiction/control of any foreign country will be required to show compliance with MARPOL Annex VI/Chapter 4 (including appropriate international certificates). The USCG goes on to state that at this time (my emphasis added), MARPOL Annex VI/Chapter 4 provisions do not apply to US flagged vessels which operate only in US waters or solely in the Great Lakes. They also note that vessels operating between the US East and West Coasts via the Panama Canal, must comply with these requirements as these voyages are considered international. Citing the provisions of MEPC.1-Circ.863 (Recommendation on exemption of ships not normally engaged on international voyages from the requirements in Chapter 4 of MARPOL Annex VI), US flag vessels which infrequently trade internationally (e.g. shipyard) may requesti this exemption which should be made through the appropriate Officer in Charge, Marine Inspection (OCMI) and forwarded to the Office of Commercial Vessel Compliance (CG-CVC) for approval. One last note to avoid any confusion, this exemption only applies to the provisions of MARPOL Annex VI, Chapter 4. It does not apply to the rest of Annex VI or existing US statutes/regulations already applicable to US flagged vessels.

<u>Activity on issues of concern:</u> During the past year, CSA provided reports, analyses, or compliance information (or combination of) to CSA members and US government entities on the following subject areas. Many are of active concern and will be followed by staff and the appropriate committees in the coming year. These will be augmented as the year progresses as new issues develop, or older issues become once again of importance to the industry.

- USCG Process to Accept Proposed Type-Approval Testing Protocols for BWMS That Render Organisms in Ballast Water Nonviable
- US Emission Control Area Compliance including Non-Complaint Fuel reporting
- USCG/EPA Joint Enforcement Program for US Emission Control Area and compliance with the global cap
- USCG Implementation of Sexual Assault and Sexual Harassment policies
- USCG Review and Revision of Recordkeeping and Reporting Requirements to establish environmental compliance on commercial vessels
- USCG Policy on Use of Overridable Power Limitation (OPLs) devices
- EPA Vessel General Permit requirements including Annual Report Filings
- California biofouling
- California ballast water regulations (revised)
- California Shore Power initiative (cold-ironing)
- California Oil Spill Response (spill team certification, fines/penalties)
- MARPOL Annex I, II, V and VI adequate reception facilities
- Fuel Oil Availability
- Fuel Oil Quality
- STCW implementation and revisions



- Maritime Security- Global BMP, Piracy, Maritime Industry Security Threat Assessments (MISTA), Houthi attacks in the Red Sea, Threats from Iran and its Proxies, Combat in the Black Sea and Sea of Azov, Smuggling, U.S. Maritime Alerts and Advisories
- Cybersecurity Regulation, USCG NPRM, IMO revision of Guidelines on Maritime Cyber Risk Management, Strategy, Policy, and Collaboration (IMO/US)
- Seafarers' Access to Maritime Facilities
- Green House Gas initiatives (IMO including market-based initiative development)
- Ship strike mitigation (Atlantic and Pacific Coasts)
- Ballast Water Management in areas of challenging water conditions
- Ballast Water Alternate Management Systems
- US Type Approval of Ballast Water Systems
- Proliferation of No Discharge Zones in US waters
- Commercial vessel noise
- Jones Act proposed changes to weaken or strengthen existing requirements
- Jones Act waivers during natural catastrophes (hurricanes)
- Panama and Suez Canal Toll Modifications
- USCG Office of Commercial Vessel Compliance/CSA regular meetings to discuss a broad range of compliance issues
- USCG Oil Record Book Revision and use of electronic record books
- USCG Port State Control vessel compliance
- USCG Inspection delays
- CBP differential application of requirements across multiple field offices including crew change restrictions during the COVID pandemic and those relating to the Russian/Ukraine conflict
- CBP revocation of prior rulings proposal re: offshore activities

CSA Interactions and Professional Affiliations

In performing the above tasks, CSA meets with legislative personnel from both the Senate and House of Representatives. CSA also meets with administrative personnel from various government agencies including the Coast Guard, Environmental Protection Agency, State Department, Maritime Administration, National Oceanic and Atmospheric Administration, Customs and Border Protection, Department of Homeland Security, Department of Transportation, Office of Management and Budget, the White House Council on Environmental Quality, the Department of the Treasury (Office of Foreign Asset Control) and others.

CSA sits on various committees and groups that develop responses to concerns including:

- DHS's National Maritime Security Advisory Committee (NMSAC)
- Blue Sky Maritime Founding Member and working group on policy and regulations
- BIMCO Maritime Safety and Security Committee as Industry Expert
- NFPA Gas Hazards Committee and Fire Protection Aboard Ships Under Construction
- International Chamber of Shipping (Board, Marine Committee, Shipping Policy Committee, Maritime Law Committee, Working Groups on Short/Medium/Long Term Measures)



- Industry Roundtable Working Group overseeing revision of the Guidelines on Cyber Security Aboard Ships
- Maritime Technical Working Group on Offshore Wind in New York State
- World Maritime University Friends of WMU US Board of Directors

CSA also engages other organizations in a collaborative manner to promote the exchange of information and allow for discussions on issues of mutual interest which impact CSA members. These organizations include:

- American Petroleum Institute
- American Salvage Association
- American Maritime Partnership
- American Waterways Operators Association
- American Association of Port Authorities (AAPA)
- Aspen Institute
- Atlantic Council
- Belmont Shipping Club (formerly Cotton Club, Washington-based embassy transportation attaches)
- BIMCO
- Consultative Shipping Group (Foreign governments that formally interact with U. S. government)
- Consumer Energy Alliance
- Government Accountability Office
- INTERTANKO
- Maritime Law Association
- National Academy of Sciences
- National Ocean Policy Coalition
- Ocean Conservancy
- Propeller Club
- Society of Naval Architects and Marine Engineers (SNAME)
- Transportation Research Board
- US-Canada Independent Advisory Committee for Right Whale Recovery
- Various National Ship Owner Associations
- Various organized labor organizations
- Various maritime education institutions

In performing its tasks, CSA keeps members apprised of on-going developments through detailed briefings at the formal meetings of the organization as well as daily briefing material via email on issues as they develop.

<u>CSA Participation in Conferences/Meetings</u> – CSA Staff attends many meetings with individuals and groups and speaks at many public conferences, seminars, and roundtables in a given year. These frequently result in information and developments on specific issues that are transmitted to the members



for their review and consideration. Please see CSA's associated document, CSA Interactions and Activity Report, for a comprehensive list. Examples of these conferences/meetings include:

- IMO Meetings (Marine Environment Protection Committee, Maritime Safety Committee, Greenhouse Gas Working Group)
- ICS Board of Directors, Marine Committee, Shipping Policy Committee, Maritime Law Committee and Environmental Sub-Committee (CSA serves as Chair) (participant)
- Consultative Shipping Group Dialogue Meeting with US Government and Chamber of Shipping of America
- BIMCO Safety and Security Committee (Industry Expert)
- White House National Security Council, State Department and USCG on air emissions and GHG policies
- White House Council on Environmental Quality meeting on National Ocean Policy (participant)
- House Transportation and Infrastructure Committee Hearings
- US State Department Sanctions meeting (participant)
- US State Department meetings on UNCLOS amendments on biodiversity on the high seas (participant)
- USCG Office of Commercial Vessel Compliance meetings (convener)
- USCG and EPA VIDA Regulatory Team meetings (participant)
- Consultative Shipping Group meetings (presenter)
- Belmont Shipping Club (formerly the Cotton Club) bi-annual briefings briefing (presenter)
- Marine Innovation Summit and SeaAhead Advisory Board meetings (participant)
- Underwater Noise Advisory Group (participant)
- Industry Roundtable Working Group member for the creation and each revision of The Guidelines on Cyber Security Onboard Ships
- Industry expert on New York State Offshore Wind Maritime Technical Working Group
- Atlantic Council Cyber Initiative (presenter)
- BOEM Offshore Wind (presenter)

<u>CSA Awards Programs</u> – CSA administers three award programs annually which include the Ship's Safety Achievement Awards, the Devlin Safety Awards, and the Environmental Achievement Awards.

- CSA's Environmental Achievement awards will be held on November 12, 2024 in Washington, DC.
- In June 2024, 1056 vessels owned/operated by 34 companies received safety awards for operating for at least two years without a lost-time incident. These vessels collectively represent 7341 years without a lost time accident. In June 2024, 16 vessels received awards for safety achievement in providing search and rescue activities that resulted in savings of lives and ships.
- In November 2023, 1196 vessels owned/operated by 53 companies received environmental achievement awards for operating for at least two years in environmental excellence. These vessels collectively represent 13068 years without a reportable incident.