CSA **CHAMBER OF SHIPPING OF AMERICA**

MONTHLY REPORT for ICS

July 2024

NOTE TO THE READER: Reference to the Federal Register may be found at http://www.gpo.gov/fdsys/browse/collection.action?collectionCode=FR.

References to legislation may be found at https://www.congress.gov
at the center of the page.

Loper Bright Enterprises v. Raimondo and Relentless, Inc. v. Department of Commerce ("Loper Bright) (https://en.wikipedia.org/wiki/Loper_Bright_Enterprises_v._Raimondo)

The above referenced case was decided on 28 June by the United States Supreme Court with Chief Justice John Roberts writing the majority opinion. This case overruled the principle established in the Chevron v. NRDC case which had directed courts to defer to an agency's interpretation where any ambiguity existed as to the meaning of the statutory text. As provided in the KL Gates summary which may be viewed at https://www.klgates.com/Down-Goes-ChevronEnvironmental-Challenges-Will-Soon-Follow-7-3-2024 , this decision will have significant impacts on how federal agencies (including EPA, USCG) implement the statutory text enacted by Congress, particularly as to how the agency interprets situations which are not specifically addressed in statutory text. As noted by the KL Gates advisory, "the decision presents significant opportunities to regulated entities who may now challenge a wide range of existing environmental regulations and agency interpretations, with far greater means to shape environmental regulations going forward."

US House of Representatives – CG and Maritime Transportation Subcommittee – Roundtable on Reinvigoration the US Flag Fleet and Shipbuilding Industry

In early July, the above referenced subcommittee held a roundtable on reinvigoration of the US flag fleet and shipbuilding industry. Please note that this was not an official hearing but rather a roundtable where an exchange of ideas and recommendations occurred between Members and private sector participants which included representative from the American Waterways Operators, USA Maritime, Shipbuilders Council of America, maritime labor unions and others. A copy of the Chairman's opening statement may be viewed at the link below:
https://transportation.house.gov/news/documentsingle.aspx?DocumentID=407649

Key takeaways from the roundtable discussion are as follows:

- This roundtable was convened to hear the thoughts of industry about what should be in now developing National Maritime Strategy and what, if anything, needs to be done by the legislative branch.
- The discussion was "all over the place" with no short list of high priority items recommended, much like the discussions we and others have already had with MARAD as they move toward finalization of the National Maritime Strategy.
- Focus (if you can call it that) was on reinvigoration of the US maritime industry including the US flag international fleet, US shipbuilding, mariner shortage/recruitment/retention, ports and offshore wind
- Triggers for need are the current Chinese "threats" to the global maritime industry, Chinese maritime programs/subsidies and their increase over the past decade, threats to US national and economic security
- Need for a globally competitive US maritime industry both afloat, in ports and shipbuilding
- Need publicized strong support for the Jones Act and the US maritime industry as a whole
- Need for public marketing and outreach program to show importance of maritime industry to US national and economic security
- One participant recommended a creation of the comprehensive "new" Merchant Marine Act of 2025 which would presumably supersede the current Jones Act, although likely leaving intact relevant programs
- Mariner and shipbuilding workforce training are critical
- Tax incentives are a possible way forward both with respect to corporate taxes and income taxes as applied to US mariners
- One participant noted the potential security issues associated with foreign flag vessels and non US mariners versus US flag vessels and US mariners
- One Member requested that industry should publish a white paper with recommendations which one industry participant stated was being worked on (KJM question – isn't this the same content the National Maritime Strategy should contain given industry is already working with MARAD on this project?)
- One suggestion to upgrade the current antiquated mariner credentialing system to online submission and review format which should reduce time necessary for processing and insuring full submission
- Need to consider stringency of US regulations (all types) versus regulations applicable to foreign flag vessels and close the gap
- When asked the #1 impediment to reinvigorating the US fleet and US shipbuilding capacity the following ideas were noted:
  - ✓ Need full enforcement of the Jones Act (e.g. reduce CBP rulings contrary to best interests of the US particularly on OCS)
  - ✓ Lack of government/industry program to promote the industry

- ✓ Lack of subsidies to make building in US yards more competitive with foreign yards (US build 4 times more expensive)
- ✓ Lack of 100% cargo preference requirements
- ✓ CAPEX and OPEX differentials between US build and own/operate costs

These are most of the common themes running through what was a relatively disorganized discussion. A few major take home points synthesized from this discussion:

➢ Need for clear and comprehensive National Maritime Strategy supported by the legislative and executive branches and agreed by government and industry

➢ Need active leadership by government and industry to implement this strategy and "sell" it to the American people

➢ Need to create business environment where it is attractive to invest in the US maritime industry e.g. US flag internationally trading vessels, shipbuilding and ports

➢ Need to create business environment to promote the carriage of cargo on US flag vessels trading internationally e.g. cargo preference, corporate tax breaks

Recordkeeping and Reporting Requirements to Document Environmental Compliance on Certain Commercial Vessels – Request for Information
(89 Federal Register 111 – pgs. 48515-48517)

As summarized in last month's report, the above RFI solicited comments on how the current reporting and recordkeeping requirements currently contained in the USCG ballast water regulations and the VGP regulations might be improved and contained in a consolidated reporting portal. Comments which were due on July 22, 2024 were timely submitted which are reproduced below.

General Comments

- It should be recognized that individual company compliance programs vary greatly in the manner in which they are administered. In most cases, shipboard personnel collect and record the data, although data submissions may be made directly by the shipboard personnel, e.g. NBIC reports, while most are forwarded from the shipboard personnel to a shoreside specialist(s) which review the information before it is submitted, e.g. EPA VGP Annual Report.

- Recognizing that the current reporting formats were designed separately by the USCG and EPA, with the combined regulatory program which will result from the EPA and USCG regulations, we recommend that all data points required in the current reporting requirements be combined into

one format and be accessible through one website with appropriate account access and password protection for each user.

- Each reporting entity should be able to set up their account with general identification information and company profile and then enter each vessel subject to the reporting requirements as a sub-account under the entity account. Vessel sub-accounts would be tied to the main company account thus preventing the current situation where changes must be made to every vessel file for information which does not usually change e.g. reporting entity profile, address, etc.

- The company account and vessel sub-account should be accessible by both shipboard and shoreside personnel to facilitate the usual situation where data is collected and recorded by shipboard personnel, but later reviewed and verified by shoreside personnel prior to submission.

- All information entered into the original account and sub-accounts should remain on the reporting page and all information previously input should pre-populate when the next report is to be submitted. This will allow users to change/delete only those data points which have changed since the last submission and will prevent the currently duplicative work required to input each reporting period information which does not change e.g. company name, address, ballast tank listing, equipment type, etc.

- All report formats should be automatically updated once the new report is submitted.

- The preparer's submission date should match the certifiers data as a default. In the practical situation where these dates are different due to lag time between preparer submission and certifier date, both data fields should be able to be changed from the default.

- Each vessel file should contain a data point where delivery/redelivery of vessel from the current entity to another company can be updated.

- Current users are familiar with Microsoft products and every effort should be made to continue to use these systems familiar to both industry and government users and which provide a number of options to manipulate data via the various MS office applications. Further consideration should be given to the use of formats that can be easily transmitted via email to facilitate data transmission between shipboard personnel, shoreside personnel and the USCG/EPA. As an example, the current VGP Annual Report is a 30 MB spreadsheet, which is far too large to send via email.

- When the new system is on line and ready for use, we suggest that a user training program be created for online access as well as an ongoing link to a help desk when problems arise.

- All reporting templates should be available for review on the home page of the new site to allow user review before signing on to their account and sub-account for data input and report transmission.

Other General Comments/Questions

- Reporting frequencies and reporting periods should be aligned with a combined system.

- Current self-reporting requirements for USCG are when the event occurs while the current EPA self-reporting is on an annual basis. Consistent with the point above, all self-reporting requirements should be the same.

- BWTS calibration requirements should be aligned. The current VGP annual calibration requirements are onerous, and OEMs were not ready to support this requirement. BWTS calibration requirements should require calibration "consistent with OEM guidance".

- There are VGP calibration and sampling requirements which are "annual" but "annual" is not defined e.g. is it per calendar year or per every 365 day period starting with the last calibration? The annual comprehensive inspection is specifically every 12 months. USCG should clearly define "annual", be specific on the deadlines and align all annual requirements using the same criteria.

- As noted elsewhere in these comments, the entire ballast water discharge reporting requirements should be fully aligned and reported through the single portal thereby eliminating the need for the separate eNOI and NBIC report formats and separate submission portals. In addition, the current requirement in the VGP Annual Report which requires reporting of the approximate % of time the vessel was in each US region during the reporting period should be eliminated as this information is already available in the current NBIC data and could be queried if necessary.

- USCG should recognize system generated reports for monthly parametric monitoring requirements.

- USCG should consider including a formatted BWTS log in the type approval process that includes the current EPA requirements to provide flow rates, UV intensity, pressure across filter and other system specific data.

- Will the USCG be changing the VGP drydock report requirements and if so, can a template with specific bulleted requirements be provided?

Responses to Specific Questions Posed

A. General Question – What amount of time and resources are devoted per vessel to monitoring, recordkeeping, compiling data, and preparing reports to comply with the EPA's VGP and the Coast Guard's ballast water management requirements?

These parameters vary widely across the industry. Generally depending on the report, data collection on the vessel is done by the Master, Chief Mate, Chief Engineer and/or Third Mate while certain reports require data to be forwarded to or data to be generated by shoreside personnel which include the company Health/Safety/Environmental (HSE) professional, port engineers and outside third party vendors (in the case of BWTS calibration and BW sampling). A table of the various compliance tasks, frequency, task, personnel involved and estimated hours for each task is attached as Annex I. Additional information may be found at Annex II.

B. Information Collection by Vessel Owner or Operator for Submission to the Coast Guard EPA or Both

1) **Do you recommend any specific improvements for completing the vessel's ballast water management reporting form for submission to the NBIC and why?**   See general comments above regarding the need to combine all data points into one format.

2) **Based on your current experience with collecting information for the EPA's VGP via the Electronic Notice of Intent (eNOI) application, do you recommend any specific improvements to a potential future compliance and enforcement data system and why?** See general comments above regarding the need to combine all data points into one format.

C. Compiling Data and Preparing Reports by Vessel Owner or Operator for Submission to the Coast Guard, EPA or Both

1) **Based on your current user experience with the instructions provided on the vessel's VGP annual report and the vessel's ballast water management reporting form, what improvements to a potential future compliance and enforcement data system do you recommend?** Once the new streamlined system is created, we recommend the creation of an interactive online training system to assist the user in learning the new system. In addition, a help line/email should be provided in the system so users may ask specific questions.

2) Based on your current user experience with completing the vessel's VGP annual report and the vessel's ballast water management reporting form, what improvements to a potential future compliance and enforcement data system do you recommend? Once the new streamlined system is created, we recommend the creation of an interactive online training system to assist the user in learning the new system. In addition, a help desk/email should be provided in the system so users may ask specific questions.

3) Are there any other types of software, in addition to using Microsoft Office file formats, that you use for compiling EPA's VGP information? We recommend the use of Microsoft file formats for data collection and submission. Some companies use other formats for collecting the information aboard the vessel which is then sent to shore staff for conversion into the report format.

4) Does your vessel owner or operator prepare the vessel's VGP annual report, including DMR data, locally or is information compiled using other means and forwarded to a central location or separate office? In most cases, data is provided by shipboard personnel and forwarded to shore staff for review and submission.

5) Based on your current user experience with compiling and preparing information for submission to either the EPA" s VGP eNOI application or to the NBIC, are there any specific improvements to any potential future compliance and enforcement data system you recommend? See general comments above regarding the need to combine all data points into one format.

D. Submission of Reports by Vessel Owner or Operators to the Coast Guard or EPA.

1) **What improvements with submitting the vessel's ballast water management reporting form do you recommend?** Recommend review of the California State Lands Commission misp.io portal as it provides a logical and user friendly system by which information is submitted. Also recommend review of the Environmental Ship Index portal that allows Excel uploads of certain data as well as a logical format with click through questions. Also suggest a new portal as recommended above have if/then question logic so that only those portions of the report that apply to the user are fully displayed in the format.

2) **Are there any specific improvements you suggest for submitting information to the NBIC website?** See response to 1) above.

3) **Based on your user experience with completing and submitting the vessel's VGP annual report, including any DMR data, what**

recommendations do you have for any potential future compliance and enforcement data system? See response to 1) above.

4) **Based on your user experience with the EPA's VGP eNOI system and the submission process (including data verification) for the annual report, what recommendations do you have for any potential future compliance and enforcement data system?** See response to 1) above.

ANNEX I – Task/Frequency/Personnel/Hours

Task Frequency	Task	Personnel	Hours
Daily	Check NBIC reports for discharges in VGP Waters	Office HSE	<0.5/day
2-3 times per week	Submit NBIC reports to USCG and relevant state	Usually Chief Mate	<0.5/vessel/report
Weekly	Weekly Inspection of vessel	Usually 3M	~1 hr/week/vessel, more if there are corrective actions
Monthly	Monthly Functionality Monitoring of BWTS	CM, CE, other vessel personnel	
Annually	Annual Comprehensive Inspection of vessel	Master and CE, other vessel personnel	
Annually	BWTS Sampling	Port Engineers, third-party vendor, CM, CE, other vessel personnel, and Office HSE	~10 hrs/vessel/year if no issues
Annually	BWTS Calibration	Port Engineers, third-party vendors, and Office HSE	~20 hrs/vessel/year if no issues
Annually	VGP Annual Report to EPA	Office HSE, CM, Master, CE, and Port Engineers	>40 hours/vessel/year

Task Frequency	Task	Personnel	Hours
Annually	VGP and MARPOL training	Vessel crew, office personnel	

ANNEX II – Sample Responses to Questions

Timeline to complete the Annual Report:
- Start: January 1st
- End: February 28th

It is a team effort that consists at least 10 stakeholders that contributes to the process of collecting, compiling, verifying, and submitting information to comply with the EPA's Vessel General Permit (VGP) and the Coast Guard's ballast water management requirements. The document details how the Environmental Specialist (from shoreside) requests and reviews the information from the fleet, such as the vessel information, VGP inspections, ballast water treatment system (BWTS) information, anti-fouling hull coating information, environmentally acceptable lubricants (EALs), citations, and noncompliance. The document also lists the sources of information from Fleet Technical, Fleet Operations, and other departments. Please see process details below those answers to the following questions.

Recommendations

Recommendations for improving the data collection and submission process which includes the following:
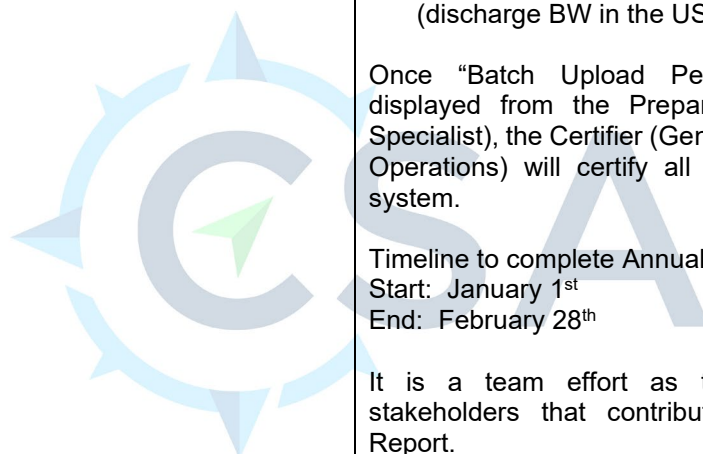- The NOI should be updated when the annual report is submitted.
- The change of address should be done in one location instead of each vessel.
- The NOI Preparer's date should match the Certifier's date.
- The delivery or redelivery of the vessel should allow the transfer of vessel information.

In addition, we propose that all data points required by the EPA and the USCG should be combined into one set of requirements and one portal for submission.

A. General Question

What amount of time and resources are devoted per vessel to monitoring, recordkeeping, compiling data, and preparing reports to comply with the EPA's VGP and the Coast Guard's ballast water management requirements? Please provide information about who collects this information, such as the Master, environmental compliance officer, or vessel operator, and the amount of time these individuals spend on the different elements of this activity.	On the first business day in January, the Environmental Specialist (from shoreside) sends a request for the Annual Report information to the fleet using a questionnaire similar to the export template. Captain / First Officer and / or Chief Engineer / First Engineer will complete the questionnaire. Turnaround time is typically 1 – 2 weeks due to finding downtime to complete the questionnaire. Also requested the fleet for vessels that discharged ballast water within US waters to provide BWTS export data [Discharge Monitoring Reports (DMRs)] for the relevant discharge months. Since files(s) are typically large, an option to upload them into Snapmirror. Once all questionnaire has been submitted, Environmental Specialist will go through each questionnaire one-by-one to confirm all information is correct by cross-referencing the following: • Vessel information – go on Vessel Certificates (maintained by Compliance Assurance Specialist; spreadsheet provided).

	- VGP Inspections and Anti-Fouling Hull Coating Information – request information from Fleet Technical (maintained by Shipyard and Alterations Superintendent; spreadsheet provided). - BWTS Information - Request information from Fleet Technical – Reliability Engineer (maintained by Environmental Specialist; spreadsheet provided). - Sampling spreadsheet for biological monitoring and residual biocide / derivative monitoring events (maintained by Lead Environmental Specialist). - Anti-Fouling Hull Coating Information - Request information from Fleet Technical (maintained by Hull & Systems Engineer; spreadsheet provided). - Environmentally Acceptable Lubricants (EALs) – request information from Fleet Technical (maintained by Reliability Engineer; spreadsheet provided). - Citations and Warnings – request from Fleet Operations if any. - Noncompliance – request from Fleet Operations if any. For the vessels that provided the discharged ballast water within US waters to provide BWTS export data [Discharge Monitoring Reports (DMRs)] for the relevant discharge months, the Environmental Specialist will compile the data by exporting the information (i.e., type of BWTS, technology type, parameter used to measure system functionality, etc.) in order to provide the minimum, average, and maximum outputs for the desired parameters for the relevant discharge months. After Environmental Specialist reviews and cross-reference the information, the information will then be copied and pasted onto the appropriate export template below. - AnnualReportBatch_20XX No Enter (didn't enter US waters) - AnnualReportBatch_20XX No DMR (didn't discharge BW in the US) - AnnualReportBatch_20XX VGP Report (discharge BW in the US) **Total vessels in the fleet = 29**

	Once spreadsheet templates are completed and saved, generate XML as it is designed to validate most of the data entry and identify errors that must be corrected. The XML generator for the annual report will provide any details of which cell in the spreadsheet needs to be corrected before a complete XML file is generated.
	Login to EPA Central Data Exchange (CDX) portal and connect to the 2013 VGP eNOI System. Upload the following Batch Annual Report Spreadsheet in the completed XML document below.
	• AnnualReportBatch_20XX No Enter (didn't enter US waters) • AnnualReportBatch_20XX No DMR (didn't discharge BW in the US) • AnnualReportBatch_20XX VGP Report (discharge BW in the US)
	Once "Batch Upload Pending" has been displayed from the Preparer (Environmental Specialist), the Certifier (General Manager Fleet Operations) will certify all 29 vessels in the system.
	Timeline to complete Annual Report: Start: January 1st End: February 28th
	It is a team effort as there are various stakeholders that contribute to the Annual Report.

B. Information Collection by Vessel Owner or Operator for Submission to the Coast Guard, EPA, or Both

Do you recommend any specific improvements for completing the vessel's ballast water management reporting form for submission to the NBIC (National Ballast Information Clearinghouse) and why? Please provide details.	?
Based on your current experience with collecting information for the EPA's VGP via the Electronic Notice of Intent (eNOI) application, do you recommend any specific improvements to a potential future compliance and enforcement data system and why? Please provide details.	Improvements to the eNOI: • Update the NOI when Annual Report is submitted as it reflects any updates pertaining to the vessel (i.e., Vessel Information, VGP Inspections, Anti-Fouling Hull Coating Information, EALs, etc.). • Change of address: There needs to be one location to update change of address to the account (Vessel Owner / Operator Information) instead of going one by one

	updating the change of address to each vessel on the account. • NOI Preparer's date needs to match the Certifier's date when NOI is updated. This usually causes confusion as it seems that it is not up to date. • Delivery / Redelivery of vessel: There needs to be a transfer of vessel information that can be obtained and update as necessary when completing a NOI.

C. Compiling Data and Preparing Reports by Vessel Owner or Operator for Submission to the Coast Guard, EPA, or Both

Based on your current user experience with the instructions provided on the vessel's VGP annual report and the vessel's ballast water management reporting form, what improvements to a potential future compliance and enforcement data system do you recommend? Please provide details.	Instructions provided on the vessel's VGP annual report is reasonable. Usually will contact VGP eNOI System support (vgpenoi@epa.gov) if there are any questions or clarifications to the vessel's VGP annual report.
Based on your current user experience with completing the vessel's VGP annual report and the vessel's ballast water management reporting form, what improvements to a potential future compliance and enforcement data system do you recommend? Please provide details.	Improvements with completing the vessel's VGP annual report: • No need to submit a VGP annual report if a vessel did not enter US waters.
Are there any other types of software, in addition to using Microsoft Office file formats, that you use for compiling EPA's VGP information? Please provide details.	No. Using Microsoft Office file formats (i.e., Microsoft Excel).
Does your vessel owner or operator prepare the vessel's VGP annual report, including DMR data, locally or is information compiled using other means and forwarded to a central location or separate office? Please provide details.	On the first business day in January, the Environmental Specialist (from shoreside) sends a request for the Annual Report information to the fleet using a questionnaire similar to the export template. C Captain / First Officer and / or Chief Engineer / First Engineer will complete the questionnaire. Turnaround time is typically 1 – 2 weeks due to finding downtime to complete the questionnaire. Also requested the fleet for vessels that discharged ballast water within US waters to provide BWTS export data [Discharge Monitoring Reports (DMRs)] for the relevant discharge months. Since files(s) are typically large, an option to upload them into Snapmirror. Once all questionnaire has been submitted, Environmental Specialist will go through each questionnaire one-by-one to confirm all information is correct by cross-referencing the following:

	- Vessel information – go on Vessel Certificates (maintained by Compliance Assurance Specialist; spreadsheet provided).
	- VGP Inspections and Anti-Fouling Hull Coating Information – request information from Fleet Technical (maintained by Shipyard and Alterations Superintendent; spreadsheet provided).
	- BWTS Information
	   o Request information from Fleet Technical – Reliability Engineer (maintained by Environmental Specialist; spreadsheet provided).
	   o Sampling spreadsheet for biological monitoring and residual biocide / derivative monitoring events (maintained by Lead Environmental Specialist).
	- Anti-Fouling Hull Coating Information
	   o Request information from Fleet Technical (maintained by Hull & Systems Engineer; spreadsheet provided).
	- Environmentally Acceptable Lubricants (EALs) – request information from Fleet Technical (maintained by Reliability Engineer; spreadsheet provided).
	- Citations and Warnings – request from Fleet Operations if any.
	- Noncompliance – request from Fleet Operations if any.
	
	For the vessels that provided the discharged ballast water within US waters to provide BWTS export data [Discharge Monitoring Reports (DMRs)] for the relevant discharge months, the Environmental Specialist will compile the data by exporting the information (i.e., type of BWTS, technology type, parameter used to measure system functionality, etc.) in order to provide the minimum, average, and maximum outputs for the desired parameters for the relevant discharge months.
	
	After Environmental Specialist reviews and cross-reference the information, the information will then be copied and pasted onto the appropriate export template below.
	
	- AnnualReportBatch_20XX No Enter (didn't enter US waters)
	- AnnualReportBatch_20XX No DMR (didn't discharge BW in the US)

	• AnnualReportBatch_20XX VGP Report (discharge BW in the US)
	Total vessels in the fleet = 29
	Once spreadsheet templates are completed and saved, generate XML as it is designed to validate most of the data entry and identify errors that must be corrected. The XML generator for the annual report will provide any details of which cell in the spreadsheet needs to be corrected before a complete XML file is generated.
	Login to EPA Central Data Exchange (CDX) portal and connect to the 2013 VGP eNOI System. Upload the following Batch Annual Report Spreadsheet in the completed XML document below.
	• AnnualReportBatch_20XX No Enter (didn't enter US waters) • AnnualReportBatch_20XX No DMR (didn't discharge BW in the US) • AnnualReportBatch_20XX VGP Report (discharge BW in the US)
	Once "Batch Upload Pending" has been displayed from the Preparer (Environmental Specialist), the Certifier (General Manager Fleet Operations) will certify all 29 vessels in the system.
	Timeline to complete Annual Report: Start: January 1st End: February 28th
	It is a team effort as there are various stakeholders that contribute to the Annual Report.
Based on your current user experience with compiling and preparing information for submission to either the EPA's VGP eNOI application or to the NBIC, are there any specific improvements to any potential future compliance and enforcement data system you recommend? Please provide details.	Improvements to the EPA's VGP eNOI application: • Update the NOI when Annual Report is submitted as it reflects any updates pertaining to the vessel (i.e., Vessel Information, VGP Inspections, Anti-Fouling Hull Coating Information, EALs, etc.). • Change of address: There needs to be one location to update change of address to the account (Vessel Owner / Operator Information) instead of going one by one updating the change of address to each vessel on the account.

	• NOI Preparer's date needs to match the Certifier's date when NOI is updated. This usually causes confusion as it seems that it is not up to date. • Delivery / Redelivery of vessel: There needs to be a transfer of vessel information that can be obtained and update as necessary when completing a NOI.

D. Submission of Reports by Vessel Owner or Operators to the Coast Guard or EPA

What improvements with submitting the vessel's ballast water management reporting form do you recommend? Please provide details.	?
Are there are any specific improvements you suggest for submitting information to the NBIC website? Please provide details and examples of what works well and data fields that could be improved for ease of submission.	?
Based on your user experience with completing and submitting the vessel's VGP annual report, including any DMR data, what recommendations do you have for any potential future compliance and enforcement data system? Please provide details.	Recommendations with completing and submitting the vessel's VGP annual report, including any DMR data: • All data points required under the current, but separate EPA and USCG regulations should be combined into one set of requirements listing all data points. • One portal should be created by which all submissions may be uploaded. This will give both agencies (i.e., EPA and USCG) to the information needed to assess compliance within one database. • Though should be given as to the appropriate format and programs available to maximize the efficiency of the data submission process is usable form by both submitters and the agencies (i.e., EPA and USCG).
Based on your user experience with the EPA's VGP eNOI system and the submission process (including data verification) for the annual report, what recommendations do you have for any potential future compliance and enforcement data system? Please provide details and examples of what works well.	Recommendations to the EPA's VGP eNOI application: • Update the NOI when Annual Report is submitted as it reflects any updates pertaining to the vessel (i.e., Vessel Information, VGP Inspections, Anti-Fouling Hull Coating Information, EALs, etc.). • Change of address: There needs to be one location to update change of address to the account (Vessel Owner / Operator Information) instead of going one by one updating the change of address to each vessel on the account. • NOI Preparer's date needs to match the Certifier's date when NOI is updated. This

	usually causes confusion as it seems that it is not up to date.
	• Delivery / Redelivery of vessel: There needs to be a transfer of vessel information that can be obtained and update as necessary when completing a NOI.
	• All data points required under the current, but separate EPA and USCG regulations should be combined into one set of requirements listing all data points.
	• One portal should be created by which all submissions may be uploaded. This will give both agencies (i.e., EPA and USCG) to the information needed to assess compliance within one database.
	• Though should be given as to the appropriate format and programs available to maximize the efficiency of the data submission process is usable form by both submitters and the agencies (i.e., EPA and USCG).