

CONTROL OF BALLAST WATER DISCHARGES ON GREAT LAKES NOT NECESSARY

In regulating vessels there may be good reason to control the discharge of ballast water from vessels inbound to the Great Lakes from foreign ports outside the North American continent, but we see no necessity for regulating the discharge of ballast water from Great Lakes vessels. Typical Great Lakes cargo vessels employ no dual service ballast tanks, the water ballast spaces being devoted entirely to ballasting purposes. Since these vessels operate exclusively within the Great Lakes, the possibility of contamination occurring from ballast water discharges is minimal.

On the Great Lakes the ballasting of a vessel is intricately connected with the carrying of cargo, particularly the self-unloading type vessel which is equipped with a large conveyor boom on deck. Any restrictions or curtailments on the right to take on or discharge ballast water could jeopardize the safety of the vessel. Anyone promulgating regulations in this area must be extremely knowledgeable concerning marine safety. Presumably with the enforcement of all applicable pollution regulations, it should make no difference within the Great Lakes themselves whether or not a vessel discharges or takes on ballast water, provided it does not have dual service ballast tanks.

Mr. Chairman, there is more to this, but I am going to skip some more. We have drafted, as I said, a proposal which would take care of these points.

I thank you very much.

(The complete statement follows:)

STATEMENT OF LAKE CARRIERS' ASSOCIATION, PRESENTED BY VICE ADM. JAMES A. HIRSHFIELD, U.S. COAST GUARD, RETIRED, PRESIDENT

I am Vice Admiral James A. Hirshfield, United States Coast Guard, Retired, President of Lake Carriers' Association. Our Association is an organization consisting of 22 vessel companies owning and operating on the Great Lakes in the aggregate 207 bulk cargo vessels comprising 97% of the Great Lakes fleet under United States flag. These vessels have a total trip carrying capacity in excess of 2,740,000 gross tons and transport in excess of 95% of the total bulk commodity commerce of the Great Lakes which moves by American flag vessels. Therefore, it can be readily seen that our interest is the Great Lakes.

THE GREAT LAKES

For the better understanding of our Great Lakes ships and their operation, I would like to note briefly some of the peculiarities of the Great Lakes; peculiarities which have not counterpart elsewhere in the world and which are, we believe, deserving of special consideration in the framing of legislation, particularly when such an all-embracing subject as water pollution is involved.

First of all, the Great Lakes chain constitutes the largest body of fresh water in the world, the water area aggregating 95,160 square miles. These waters are shared with Canada inasmuch as, with the exception of Lake Michigan, the international boundary line between the two countries runs approximately along the axis of each lake from a point about 100 miles from the head of Lake Superior to the foot of Lake Ontario, and in the St. Lawrence River to the mouth of the St. Regis, 66 miles above Montreal. Of the total water area of the Great Lakes, 34,210 miles lie within the Dominion of Canada. Of the total shoreline of the Great Lakes, over 8,300 miles, about 4,300 miles are in Canada.

The Great Lakes are truly international waters, and they have been declared to be so by treaty. The ports of the Great Lakes are served not only by American