

1. Wastes from watercraft must be recognized as important sources of pollution and given the proper attention by all regulatory agencies—Federal, state, and local. Because of the special nature of this type of pollution, unusually close coordination must be achieved between the various jurisdictions involved. It is our opinion that the regulatory agencies have not given enough attention to this problem in the past.

2. Pollution from watercraft must be approached without favor as to size, use, and country of origin. In short, we believe that regulations should apply equally to the largest liner and tanker and to the smallest type of recreational boat which has toilet facilities. We hope that vessels owned by the U.S. Government, including military craft, can set a proper type of example in the handling of their wastes. And, regulations must be made applicable to vessels under foreign registry which visit the United States as well as to those flying the U.S. flag. Commercial vessels of the U.S. should not be placed at a competitive disadvantage by being required to meet pollution control standards not required of others which use the same waters.

3. It is especially important that harbors be equipped with the proper dockside facilities to handle wastes from watercraft, both in the form of sewage connections to ships tied up in port and to handle wastes collected in holding tanks. This probably is the best solution whereby pollution from many foreign nations can be handled. The installation of proper holding or treatment facilities by vessels of some foreign countries may be difficult to achieve. But, if they can hook up to waste discharge facilities at docks in the U.S., this procedure will enhance the likelihood of controlling pollution. It appears tremendously important to us that these facilities be available to ships in as many ports as possible.

4. It is essential that effective laws and regulations to control vessel pollution be enacted and vigorously enforced. These should be made effective as far as out from land as the U.S. jurisdiction will permit. More and more Americans are seeking recreation along beaches which easily can be fouled by pollution or litter from watercraft. In this connection, we also would suggest that the Committee explore the desirability of invoking an international treaty for pollution discharges similar to that now applicable to oil. In other words, wastes could be dumped only in certain zones far at sea.

5. Marinas and other floating facilities used to service boats, and houseboats, should be regulated for water pollution in the same manner as land-located sources of pollution.

#### GENERAL OBSERVATIONS

To conclude this statement, Mr. Chairman, we should like to make two general observations.

First, back when the Water Quality Act of 1965 was passed, we were pleased that it seemed to set the stage for a flat-out declaration that the United States was setting a floor on water pollution—that conditions would not be allowed to get any worse—that all movement would be upward, toward enhancement of the quality of public waters. As you know, the States were required to develop recommended standards of quality by June 30 of last year (1967). Guidelines were issued.

Back in the early fall, we were dismayed to learn that the Federal Water Pollution Control Administration was approving of State standards which did not meet the Interior Department's own guidelines which said: "in no way will standards providing for less than existing water quality be acceptable." The FWPCA was placing its hopes on improving the water quality through agreements to attain secondary treatment for domestic sewage and industrial effluents.

Now, we are cognizant of the fact that secondary treatment of wastes is a worthy goal in most States, one which would result in the improvement of many lakes and streams and coastal areas. However, we are equally aware that secondary treatment is not 100 per cent effective—perhaps 85 per cent at best—and the net accumulative effect of several plants can result in damage or destruction of waters just as surely as no treatment at all. And, we also know that secondary treatment is not effective on some pollutants, notably nutrients and heavy metals and thermal pollution.

Thus, the representatives of several citizen groups, in October of 1967, protested to the Secretary of the Interior and he suspended approvals of State standards until the problems could be reviewed. We protested against the degradation