

efforts at all levels of government. I am apprehensive that the time and cost factors of the comprehensive estuaries study have been grossly underestimated. With all due respect, the "contract" proposal should be carefully reevaluated from the standpoint of its compatibility with local financing practices and its potential for assisting ongoing State programs. Abandonment of the "repayment" provision and loss of tax exempt status for bonds sold to finance pollution control works are particularly damaging features. I would prefer to see the construction grant changes (contract features) deleted entirely if the inclusion of the loss of repayment possibilities and the loss of tax exemption are non-negotiable conditions for passage of that portion of the bill.

I have one further suggestion not specifically related to H.R. 15907, but nonetheless germane. Perhaps the time has come for careful examination of the method of financing Federal grants for water pollution control projects. The size of the anticipated expenditures that will be required to meet the national objectives may be too great to continue to absorb from current revenue. There could be merit in examining specific sources of revenue that might be developed and earmarked to pay for these works. One beneficial result might be a more direct relationship between those benefiting from clean water and those paying the bill for water pollution control.

STATEMENT OF SPECIAL COMMITTEE OF THE MARITIME LAW ASSOCIATION
OF THE UNITED STATES

Mr. Chairman and members of the committee, the Maritime Law Association of the United States (herein "MLA") is an organization of about 2,000 members, founded in 1899, whose members are engaged in every possible facet of maritime law, including representation of substantially all American shipowners operating passenger vessel, general cargo vessels, tankers and other bulk carriers engaged in the foreign and domestic trades of the United States, as well as their underwriters. The representation also includes licensed and unlicensed seamen.

At a meeting of the Executive Committee of the MLA on February 19, 1968, the following members of our Association were appointed to constitute a Special Committee to report and make recommendations on H.R. 14000. The Special Committee members are John F. Gerity, Chairman (Member of the Executive Committee); Burton H. White, Member (Chairman, Committee on Limitation of Shipowners' Liability); and Gordon W. Paulsen, Member (Chairman, Committee on Matters Concerning the Coast Guard Regulations).

At the Annual Meeting of the Membership of the MLA on May 3, 1968, the aforesaid Special Committee was given authorization to present the views of the MLA to this Committee.

The MLA is in complete sympathy with the task of this Committee and offers its cooperation and good offices to enact meaningful and enlightened legislation to prevent and alleviate those damaged by the pollution by oil of the navigable waters and shorelines of this nation.

This Special Committee has reviewed drafts of the testimony before the Public Works Committee of the House of Representatives and drafts of proposed changes in H.R. 14000 as put forward by the American Petroleum Institute (herein "API") and to the extent indicated below approves and endorses such proposals. It must be borne in mind however that the views of the API are necessarily circumscribed by the interests of the oil industry. That institute has emphasized excessive liability for shipowners and through possible inadvertance negated by exclusion shore installations from the subject coverage of H.R. 14000. The MLA, on the other hand, is concerned with the welfare of the entire maritime industry and maritime personnel. Accordingly, in suggesting revisions of the proposed legislation the MLA has sought to promote the Congressional intent of preventing oil pollution of United States waters in a manner which will not unnecessarily penalize the American Merchant Marine and punish maritime shipboard employees. The MLA, mindful of the precedents established in Anglo-Saxon jurisprudence, takes a broad view of the problems confronting this Committee and is hopeful that the suggestions made herein will be helpful in preventing oil pollution while at the same time that the resulting legislation will not unduly hurt the maritime industry or depart from long established and cherished principles of law.

The Membership of the MLA has respectfully authorized us to present the following points: