Great Lakes Shipping Ballast Water Regulation Update

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The Problem

• “Invasive species” -- plants or animals that are non-native (or alien) to an ecosystem, and that can cause economic, human health, or environmental damage to ecosystem. Once established, difficult to control their spread.

• According to the EPA, 30% of invasive species have been introduced in the Great Lakes through ballast water – vessels in international trade discharging waters containing non-native invasive species.

• Example is **zebra mussels**. Introduced to Lake St. Clair in 1988, and quickly spread throughout Great Lakes and into many inland lakes, rivers, and canals. Led to problems at power plants and municipal water supplies -- clogging intake screens, pipes, and cooling systems. And have also nearly eliminated the native clam population in the Great Lakes ecosystem.
The Culprits
Current Ballast Water Framework for “Lakers” in US

- Convention imposes extensive ballast regulations – Limits the number of potentially invasive organisms discharged.
- United States is NOT a signatory. Canada is.
- Expressly decided by US Coast Guard and EPA that ballast water regulations do not apply to Lakers. No need to treat ballast water.
- Why not? (1) Not ecologically necessary (GL is a single ecosystem), (2) technology does not currently exist that would allow Lakers to comply with IMO standards.
Anticosti Island - “laker line”

U.S.-flag lakers primarily upper 4 Lakes (Superior, Michigan, Huron, Erie) – seldom beyond the Welland Canal and never beyond Anticosti Island. (magenta)

Canadian-flag vessels sail on Great Lakes and Seaway – some go beyond Anticosti Island to East Coast and Arctic (green)


“Salys” are ocean-going vessels that enter the Great Lakes (Anticosti Island) from Europe, Asia, Africa… Normally registered with flags of convenience.

Welland Canal - Canada

1st U.S. entry point

Canadian Laker Trade

Canadian Laker Trade

US Laker Trade
Problem of Bi-National Trade Route Regulation

*Proposed Transport Canada Legislation*

- In October 2012, Canada proposed implementation of the IMO Convention by way of amendment to its ballast water regulations.

- If the IMO Convention becomes law, Canada’s proposed regulatory approach would apply to U.S. vessels transiting Canadian waters and would supersede U.S. ballast water rules.


- And additional regulations that are more stringent than the Convention.

- Extensions of the enforcement date are essentially unattainable – require a robust scientific assessment to justify.
The Impact – Why this Matters to Great Lakes Shipping

• U.S. Industry: 17 American companies operating 57 vessels, transporting more than 115 million tons of dry-bulk cargo/year, supporting more than 103,000 jobs in the Great Lakes with an economic impact of more than $20 billion.  
  (Source: Lake Carriers Association.)

• Iron ore, coal and limestone are primary cargos.

• Would require US Lakers to meet standards the U.S. government has deemed impossible to meet.

• Cost estimates -- $300-500MM.

• Impact of reduction in threat in aquatic invasive species is unproven (“spread” vs. “introduction”).

• When? IMO Convention is likely to be ratified in May. (Ratification threshold is 30 countries, 35% global shipping tonnage). Implementation begins 12 months later.
Questions?

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