

The Honorable Kristi Noem  
Secretary  
Department of Homeland Security  
St. Elizabeths West Campus  
Washington, DC 20528

The Honorable Russell Vought  
Director  
The Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

November 12, 2025

Dear Madam Secretary and Director Vought:

We write to urge the Administration to prioritize publication of the statutorily required U.S. Coast Guard rulemaking to implement and enforce the Vessel Incidental Discharge Act (VIDA), signed into law by President Trump in 2018. The undersigned organizations represent companies that own and operate vessels that move the nation's crucial waterborne cargoes and employ the American workers that crew, load and unload those vessels; marine terminals and port authorities through which this critical commerce moves; the cruise and passenger vessel industry; and other industries that rely on maritime shipping to transport their products to U.S. consumers and to global markets. Our organizations advocated vigorously for the passage of VIDA because it is deregulatory: when fully implemented, it will replace a patchwork of overlapping and conflicting federal and state regulations that has hampered interstate and international maritime commerce and increase the efficiency and competitiveness of the U.S. marine transportation system.

VIDA reduces regulatory burdens by directing the U.S. Environmental Protection Agency and the Coast Guard to institute a streamlined, nationally consistent framework for vessel discharge regulations to supplant the current onerous regulatory patchwork. First, EPA was required to establish performance standards for ballast water and other discharges incidental to normal vessel operations, and second, the Coast Guard was charged with establishing regulations regarding implementation, compliance and enforcement of the standards. Once this two-part process is complete, current EPA and Coast Guard regulations are to be rescinded and, crucially, state regulation of vessel discharges will be preempted.

During the first Trump Administration, EPA nearly completed a rulemaking to establish performance standards as required by the law. Unfortunately, publication of that rulemaking was delayed by the transition to the Biden Administration, but EPA ultimately published standards last year that are generally consistent with the 2020 proposed rule.

Only when the Coast Guard's implementation and enforcement rule is final and effective will current duplicative EPA and Coast Guard regulations be eliminated and state regulations be preempted. Until then, commercial vessels operating in U.S. waters will continue to be encumbered by redundant federal rules and threatened by proliferating state requirements. The status quo is a regulatory regime that kills jobs, increases costs, impacts the competitiveness of

U.S. vessels and ports, and undermines the efficiency of maritime commerce to the detriment of American producers and consumers.

By signing VIDA into law, President Trump increased certainty and reduced legal vulnerability for vessel owners and mariners and paved the way for the replacement of a convoluted, costly regulatory regime that has stifled the maritime industry for almost two decades with a common-sense, streamlined set of rules. We urge you to finish what the President started and direct the Coast Guard to finalize its VIDA implementation, compliance and enforcement requirements no later than the statutory deadline of October 2026.

Respectfully,

American Association of Port Authorities

American Maritime Congress

American Pilots' Association

American Waterways Operators

Chamber of Shipping of America

Cruise Lines International Association

Dredging Contractors of America

International Association of Independent Tanker Owners

National Association of Waterfront Employers

National Grain and Feed Association

Passenger Vessel Association

Transportation Institute

World Shipping Council

Cc: Mr. Sean Plankey, Senior Advisor to the Secretary for the Coast Guard, DHS  
Mr. Brian Cavanaugh, Associate Director for Homeland Security, OMB  
Admiral Kevin Lunday, Commandant, U.S. Coast Guard  
Chairman Ted Cruz, Senate Committee on Commerce, Science and Transportation  
Chairman Dan Sullivan, Senate Subcommittee on Coast Guard, Maritime and Fisheries  
Chairman Sam Graves, House Committee on Transportation and Infrastructure  
Chairman Mike Ezell, House Subcommittee on Coast Guard and Marine Transportation