



COLONIAL COMPLIANCE SYSTEMS, INC.
MARITIME REGULATORY CONSULTANTS

December 3, 2021

CSI Client Advisory 11-2021

SUBJECT: Vessel General Permit (VGP) – Reporting Requirement for Calendar Year 2021

Overview:

This Client Advisory provides information to the Vessel General Permit (VGP) 2021 calendar year requirements.

VGP Annual Reporting:

Paragraph 4.4.1 of the 2013 VGP requires owner/operators submit an Annual Report to the US Environmental Protection Agency (EPA) each calendar year for all vessels that have an active VGP Notice of Intent (NOI) letter, and for vessels which a Notice of Termination (NOT) was filed during 2021 because the ship was either sold or left your management. For vessels that a NOT was issued, the Annual Report will need to cover the time the vessel was under your management in 2021. The VGP Annual Report needs to be submitted no later than February 28, 2022.

The Annual Report must be made electronically and must include:

1. Any required Analytical Monitoring results
2. Any VGP related non-compliances

VGP Annual Reports for calendar year 2021 can be submitted at this time if one of the following is true:

- Vessel has an ACTIVE NOI, but did not and will not call the U.S. in 2021
- Vessel has an ACTIVE NOI and has completed their last U.S. port call for 2021
- Vessel had an ACTIVE NOI, but has since filed a NOT under the 2013 VGP

Annual Inspections:

Paragraph 4.1.3 of the 2013 VGP Final Rule requires comprehensive annual vessel inspections, and the date the inspection was completed must be listed on the VGP Annual Report. The Annual Inspection can be conducted by qualified personnel that may include the Master or owner/operator of the vessel, if appropriately trained, or appropriately trained marine or environmental engineers or technicians or an appropriately trained representative of a vessel's class society acting on behalf of the owner/operator. These inspections must cover all areas of the vessel affected by the VGP requirements without forcing a vessel into drydock.

We recommend you start the data collection process now for all applicable vessels to ensure the data is accurate and applicable for the calendar year 2021, and to ensure you meet the filing deadline of February 28, 2022.

CSI can file these reports on your behalf for a nominal fee. To file a report, CSI will need you to provide us with a list of vessels that have and have not called the U.S. in 2021. Furthermore, we will need the Annual Report data for that vessel which can be collected by using our user-friendly filing



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form (provided upon request). If you are interested in CSI's Annual Report filing service, please send us an email csi@compliancesystemsinc.com

We expect the U.S. Coast Guard, and the Environmental Protection Agency (EPA) will commence the Vessel Incidental Discharge Act (VIDA) requirements in 2022, and we will keep you updated with the details as we know more. The VIDA requirements will replace the 2013 VGP Final Rule which we are all familiar with.

This Client Advisory, along with previously issued CSI Client Advisories, can be retrieved from our website, www.compliancesystemsinc.com. If you are unable to download any of this information, please let us know and we will email it to you.