

October 24, 2017

**Testimony to the House Committee on Commerce and Trade  
in support of House Bill 5095**

Serving the business community for more than 100 years, the Detroit Regional Chamber takes pride in advocating on behalf of businesses throughout the city and region. As one of the most influential chambers of commerce in the country, our members look for us to collaborate with government partners in support of Michigan's reinvention and continued economic growth.

Our shared border with Canada serves as the largest trade crossing in the world, and the Great Lakes provide a vital conduit for both domestic and international trade. Michigan's leaders must continue to ensure that this unique Michigan asset remains a stimulant for jobs and economic growth in the region.

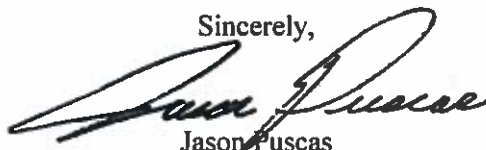
Michigan's current ballast water discharge requirements, however, present a barrier as our current patchwork of regulations creates confusion, costing time and money while doing little to protect our Great Lakes. When this permit took effect in 2007, the hope was that surrounding Great Lakes states would follow in our footsteps and implement the same standard, but this has failed to happen, all while putting Michigan at a significant competitive disadvantage.

A similar effort in 2007 and 2008 resulted in the successful implementation of the Great Lakes Compact,<sup>1</sup> which saw eight states<sup>2</sup> enter into a mutually agreed-upon set of standards on how to manage the Great Lakes basin's water supply. Of those same eight states, however, only Michigan has adopted these unique standards. The other states<sup>3</sup> have all generally harmonized their requirements with the EPA's Vessel General Permit, which also meets the water quality standard adopted by the International Maritime Organization.

Because of Michigan's ballast water regulations, we have watched business leave ports in Detroit for Toledo and Windsor. Instead of trying to address this issue as an isolated state, we need to support sufficient federal requirements<sup>4</sup> that mandate that every state, not simply Michigan, work to protect our Great Lakes.

Michigan's ports are a vital transportation asset that enables Michigan businesses to have access to world markets. By amending Part 31 of NREPA so that Michigan's ballast water discharge requirements reflect the EPA's Vessel General Permit, House Bill 5095 would level the playing field and encourage business and jobs to come back to Michigan while still protecting the Great Lakes. I appreciate your consideration and support for this positive step in Michigan's competitiveness.

Sincerely,



Jason Puscas

Director, Government Relations

<sup>1</sup> S.J.Res 45 (2008), creating the Great Lakes–St. Lawrence River Basin Water Resources Compact, was signed into law by President George W. Bush in October of 2008 following approval of all eight member state legislatures.

<sup>2</sup> Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania and Wisconsin.

<sup>3</sup> Illinois, Indiana, Minnesota, New York, Ohio, and Wisconsin. Pennsylvania has not adopted any state standards.

<sup>4</sup> E.g. S. 168 and H.R. 1154, creating the Commercial Vessel Incidental Discharge Act.