

Who Will Pay The Costs Of A Disastrous Fossil Fuel Spill Associated With The Increased Shipping Traffic Generated By Millennium Bulk Terminals- Longview?

Bulk cargo ships carrying coal are not covered by the oil spill conventions that apply to oil tankers. The bulk cargo carriers visiting the Millennium Bulk Terminals- Longview may not carry adequate insurance to cover the costs of a disastrous propulsion fuel spill along the Columbia River or near the Columbia River bar. The coal export companies may not use their own bulk cargo vessels to transport the coal overseas. The “flag-of-convenience” system allows the ship owners to be legally anonymous and difficult to prosecute in civil and criminal actions.

An oil spill off the coast of Spain was from a doubled-registered vessel, the Prestige. It was a Liberian-owned vessel with a Greek captain and Filipino crew. This ship was also registered in the Bahamas. Shipping companies double register vessels to lower their operating costs and take advantage of less restrictive laws within developing countries. Also, liability in case of a disaster falls on the ship’s crew and not on the shipping company. This business practice is called “Flag of Convenience.” “Open Registry” describes organizations that will register ships owned by foreign entities. In 2009, 13 flag states had substandard regulations.

Please include answers to the following questions in the scope of the Millennium Bulk Terminals- Longview EIS:

How many flag-of-convenience registered ships currently visit facilities along the Columbia River?

How many additional flag-of-convenience registered ships will visit facilities along the Columbia River if the proposed Millennium Bulk Terminals- Longview is permitted?

How many additional flag-of-convenience registered ships will visit facilities along the Columbia River if the all of the proposed fossil fuel export facilities are permitted?

What are the limits on liability associated with registering

vessels as independent entities not associated with the major coal export companies?

Who will be liable for the costs of a disastrous fossil fuel spill associated with the increased shipping traffic?

Thank-you,
Janet Alderton
Deer Harbor, WA