



19 September 2025

Mr. Randy Bates
Commissioner
Alaska Department of Environmental Conversation
P.O. Box 111800
Juneau, AK 9811

Subject: Requests for Exhaust Gas Cleaning System ("EGCS") Wash Water Samples and Compliance Data from Cruise Ships

Dear Commissioner Bates:

As you know, Carnival Corporation & plc ("Carnival") is the parent company of several brands that operate large cruise ships in Alaska state waters, including Carnival Cruise Line, Princess Cruises ("Princess"), Holland America Line, Seabourn, and Cunard. Over many years, our brands have and continue to greatly value the ability to freely communicate and collaborate with ADEC personnel to ensure our ships are compliantly operating in Alaska marine waters.

A small group of senior leaders from Princess recently met virtually with ADEC's Division of Water to discuss recent inspections aboard multiple ships during which ADEC's inspectors requested EGCS wash water samples and compliance data. These requests were unusual and unexpected because Alaska law is very specific that ADEC's inspection authority encompasses sewage, graywater, and other wastewater. "Other wastewater" does not include EGCS wash water.

The Division of Water explained that these requests were related to an EGCS sampling plan for a new water quality program. Princess has never been informed or briefed about such a program and requested information on the new program's objectives. To assist in providing reliable data, Princess also pointed out that it would need to understand: (1) the EGCS sample collection protocol, (2) the management of samples in terms of holding times, (3) the test methodology, and (4) how that information would be reported. Princess advised the Division of Water that it would consider participating in the program after the information is provided. This decision applies to all Carnival brands. As of today, the Division of Water has not furnished the information requested on the new program or data collection requirements. Regardless, inspectors from the Division of Water continue to seek collection of EGCS samples and compliance data (most recently from *Discovery Princess* on 03 September 2025).

During the meeting between Princess and the Division of Water, I understand it was also suggested that ADEC has the authority per Section 4 of the ADEC vessel inspection report to collect information on ballast water, hull husbandry, and waste handling, including EGCS wash

water samples and compliance data, under the Ocean Ranger Program. As you are aware, the Ocean Ranger Program was defunded in 2019, and the Alaska statutory authority for the program to monitor “discharge functions required by state and federal law” (AS 46.03.476) mentions nothing about ADEC having any kind of concurrent authority. The statute refers to the Ocean Ranger serving as “an independent observer for the purpose of monitoring state and federal requirements.” ADEC staff certainly cannot act as “an independent observer.” Moreover, in the Ocean Ranger Guidebook last issued in 2019, there are only two (2) mentions of EGCS, limited to whether a vessel was equipped with EGCS and if was in operation during a ship inspection.

Carnival has been and is committed to operating in a fully compliant manner in the waters of Alaska to protect the marine environment. As an example of this, our brands work closely with Marine Exchange of Alaska (MXAK) to independently monitor our operations in Glacier Bay National Park to provide us with an additional layer of compliance oversight. Carnival also remains a strong supporter of ADEC’s Cruise Ship Program and the Large Commercial Passenger Vessel Wastewater Discharge General Permit and looks forward to an ongoing partnership and communication in this regard. However, as noted above, Carnival would like to better understand from ADEC’s objectives, the basis and extent of its efforts, the data collection requirements, and regulatory authority to study EGCS washwater before any ships within the Carnival fleet will agree to participate.

I would greatly appreciate the opportunity to meet with you soon to discuss EGCS operations or any other matters you may wish to bring to Carnival’s attention.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Haeflinger', with a stylized flourish at the end.

John Haeflinger
SVP, Maritime Policy & Analysis
Carnival Corporation & plc