



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

Department of Environmental  
Conservation

OFFICE OF THE COMMISSIONER

PO Box 111800  
Juneau, Alaska, 99811-1800  
Main: 907.465.5066  
Toll free: 866.241.2805  
Fax: 907.465.5070  
TDD: 1(800) 770-8973  
[www.dec.alaska.gov](http://www.dec.alaska.gov)

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Mr. John Haeflinger  
Senior Vice President, Maritime Policy and Analysis  
Carnival Corporation and PLC  
Carnival Place  
3655 N.W. 87 Avenue  
Miami, Florida 33178-2428

Dear Mr. Haeflinger,

Thank you for your September 19, 2025, letter in which Carnival Corporation & PLC (“Carnival”) raised concerns and challenged the Alaska Department of Environmental Conservation’s (DEC) authority to collect information and data on ballast water, hull husbandry, waste handling, and exhaust gas cleaner system (EGCS) wash water, and challenged whether DEC staff have authority to act as an independent observer or “ocean ranger” as defined at Alaska Statute (AS) 46.03.476.

First, I’ll address the issue of whether DEC has the authority to request and review information and data related to these water discharges and compliance data. AS 46.03.465(h) states that “[o]n request, the owner or operator of a commercial passenger vessel discharging wastewater under AS 46.03.462(b) shall provide the department with information relating to wastewater treatment, **pollution avoidance, and pollution reduction measures used on the vessel, including testing** and evaluation procedures and economic and technical feasibility analyses.” (Emphasis added). Without question, DEC has the authority to request and review the information and data requested, and Carnival has the obligation to provide that information and data.

Second, I’ll address whether DEC staff meet the definition of ocean rangers and whether they have the authority to act as an independent observer. AS 46.03.476 states that “[t]he ocean ranger shall monitor, observe, and record data and information related to the engineering, sanitation, and health related operations of the vessel, including but not limited to registration, reporting, record-keeping, and discharge functions required by state and federal law.” While the ocean ranger “program” may not have state-allocated funding, DEC continues to operate under the statutory framework established by AS 46.03.476, which defines DEC’s authorities and responsibilities for the ocean ranger program.

DEC currently employs staff that meet the criteria for “ocean ranger” as defined under AS 46.03.476(d) “(1) a marine engineer licensed by the United States Coast Guard; or (2) a person who holds a degree in marine safety and environmental protection, or an equivalent course of study approved by the department, from an accredited maritime educational institution.” Those DEC staff that meet these criteria have the statutory authority to request information and data, including ECGS wash water data, any time before, during, or after an inspection. Simply put, the statute creates a program by which the term “ocean rangers” can be met by DEC staff and those individuals are empowered to request and entitled to receive information as provided for in AS 46.03.476. Carnival cannot refuse to provide data by misreading the statute in order to draw a fictional line between DEC and what it believes the ocean rangers program is.

Third, I will address the relationship between DEC and the ocean ranger “program.” As mentioned above, DEC previously implemented an ocean ranger “program” but has not funded that program since 2019. That program utilized a contract to hire and retain the services of non-state employees to serve as ocean rangers. Those contracted ocean rangers were required to reside on board the large vessels and monitor, observe, and record data and information related to the engineering, sanitation, and health related operations of the vessel. A plain language reading of the statute makes it clear that the ocean rangers are independent from the ship they are inspecting, but *not* independent from DEC. That program and the contracted ocean rangers served an important purpose for an extended period of time, but that observational role of contract ocean rangers has been replaced with a more formal compliance inspection program with DEC staff.

Finally, in its letter, Carnival stated that it would need to understand DEC’s methodology for testing ECGS wash water samples and would like to understand DEC’s intentions for collecting such data. DEC’s sample methodology and quality control practices are available in our [Quality Assurance Project Plan for Sampling and Analysis of Treated Sewage and Graywater from Commercial Passenger Vessels](#). We share this Plan with operators to inform them of process, invite discussion, and answer any questions. Regarding the intention of DEC staff to request and collect such data, I would like to discuss working together (DEC and Carnival) to better understand the composition of ECGS discharges and to assess what impacts, if any, they may have on human health and the Alaskan environment.

I appreciate Carnival’s willingness to engage in ongoing communication regarding this issue, your continued commitment to compliance while operating in the waters of Alaska, and I look forward to a productive exchange during the winter months in preparation for the 2026 Alaska cruise ship season.

Sincerely,



Randy Bates  
Commissioner