



Welcome to the USA!

A shipowner's guide to regulatory compliance – September 2022

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A shipowner's guide to regulatory compliance



Introduction

The global shipping industry is confronted with a daunting array of regulations – and concomitant liability – concerning safety, maritime security and marine environmental protection. No regime is more challenging than that of the United States where international, national and individual state rules combine to create an often-perplexing landscape of compliance.

In response to requests for guidance, the American Club is pleased to present the attached summaries of key regulations of which shipowners should be aware when trading to and from the United States and United States Territories. Members should also note that, in regard to most of these requirements, the Club also provides additional guidance, tools and services to assist them in achieving compliance. These are noted in the appropriate places herein.

Members are also urged to liaise with their local agents in advance of trading to the United States and United States Territories for guidance and assistance in regard to the local rules which may apply to them. However, Members are invited to contact the Managers who stand ready to assist with any other concerns the Member many have.



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Disclaimer

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A summary of regulatory regimes for the USA in tables, by subject

SAFETY			
Subject	Summary	American Club guidance/references	Other relevant guidance/references
COVID 19	COVID-19 continues to be a challenge to health around the globe affecting vessel arrivals at US, and US territorial, ports.	The Club maintains a site devoted to updates on the COVID-19 that can be found by clicking here .	
Ebola Virus Disease (EVD)	<p>The US has implemented various prevention and control measures to prevent the spread of the EVD.</p> <p>Of particular note, the master of a vessel destined for a US port is required to report crew or passengers, who were sick or who died within 15 days prior to entering a US port. This report must be made to the US Center for Disease Control under 42 Code of Federal Regulations (CFR) 71.21.</p>	<p>The Club has a website devoted to EVD updates and guidance on contracts and charter parties that include port requirements and restrictions for the US as well as other maritime nations that can be found by clicking here.</p> <p>The Club also maintains a dedicated website with updates on specified infectious diseases that can be found by clicking here.</p>	<p>The US Coast Guard (USCG) issued Marine Safety Bulletin 09-19 on October 7, 2019 requiring vessel agents to provide information as to whether crew members have been to Ebola-affected countries within the last 45 days. A copy of this Bulletin can be found by clicking here.</p>
Vessels calling prior ports with insufficient anti-terrorism measures	Vessels calling at US ports and traversing US waters having called at ports deemed to have insufficient anti-terrorism measures in place.		Requirements for vessels calling to the US having visited ports deemed to have insufficient anti-terrorism measures is found by clicking here .
Notice of hazardous condition	If there is a “hazardous condition” on board a vessel or caused by a vessel, the owner, agent, operator, or person in charge must immediately report it to the nearest USCG Sector Office or Group Office.		The regulation does not specify what a notice of hazardous condition should contain. However, it is best practice to provide minimum information as to the vessel’s name, location, time, date, parties involved, nature of hazardous condition, name of USCG personnel who have been spoken with and means by which notice was provided, including phone number, etc., as applicable.

SAFETY (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Casualty Reporting	<p>On July 1, 2016 the USCG released a series of updated casualty reporting forms. The documents contain several updates, including:</p> <ul style="list-style-type: none"> new addendum forms for barge involvement, personnel casualties, witnesses and drug and alcohol testing; streamlined data fields to align with statutory and regulatory language; the ability for a form to be completed electronically, including the use of a digital signature; and as of April 18, 2018, the property damage threshold for a marine casualty that requires immediate notice and a written report is US\$ 75,000 (an increase from the previous US\$ 25,000). <p>Certain reportable marine casualties would also qualify as "serious marine incidents" (SMIs) and all personnel involved in an SMI must be drug tested.</p>		<p>All 2692 Casualty Reporting Forms and guidance on casualty reporting can be found at the USCG's website by clicking here.</p> <p>A USCG 2692 form must be filed within 5 days of the incident giving rise to the obligation to file the USCG 2692 form. Members are encouraged to seek guidance from the local Club correspondent and/or legal advisor on filing out the USCG 2692 form.</p> <p>Further guidance on casualty reporting procedures with associated standard interpretations can be found by clicking here.</p>

MARITIME SECURITY

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Notice of Cargo Loading and Arrival	<p>Cargo declarations for containers destined for the US must be submitted to US Customs and Border Protection (CBP) through its Automated Manifest System (AMS) at least 24 hours before loading in a foreign port. A container stow plan must be submitted no later than 48 hours after the vessel departs the last foreign port. If a carrier collects container status messages as part of its equipment tracking system, certain of those messages must be submitted to CBP.</p> <p>Break bulk carriers are also subject to the pre-loading cargo declaration requirement but may apply to CBP for an exemption. Exempt break bulk carriers and carriers of bulk cargo must provide an electronic manifest 24 hours prior to the vessel's arrival in the US.</p>	<p>CBP's adoption of additional requirements relating to notice of cargo loading and arrival is discussed in Club Circular No. 27/08.</p>	<p>Applicable CPB regulations can be found at 19 C.F.R. § 4.7, 4.7c, and 4.7d. Information on CBP's ACE portal can be found by clicking here.</p> <p>Information on CBP's original carrier filing rule may be found by clicking here.</p>
Vessel Notice of Arrival or Departure (NOAD)	<p>For vessels entering US waters, as per the United States 33 CFR Part 160, Subpart C, US and foreign vessels bound for the US must file a Notice of Arrival/Departure (NOAD). As per 33 CFR 160.212: If your voyage time is 96 hours or more, then you must submit an NOA at least 96 hours before entering the port or place of destination. If your voyage time is less than 96 hours, then you must submit an NOA before departure but at least 24 hours before arriving at the port or place of destination.</p> <p>The NOAD must contain all of the information items specified in Table 160.206. The table may be accessed by clicking here.</p>		<p>Further information on submitting NOADs and eNOADS can be found by clicking here.</p>

MARITIME SECURITY (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Ships calling US ports from Cuba	<p>As of October 17, 2016, vessels that have delivered agricultural commodities, medicine, medical devices and purely civilian (e.g. crude oil, machinery, building products) cargoes to Cuba will no longer be prohibited from calling in the United States after they have called in Cuba.</p> <p>Still, shipowners are required to confirm that the goods shipped to Cuba are not of US origin, or if they are that they qualify for a license, and if subject to Export Administration Regulations would constitute EAR99 goods, that is, goods that consist of US or US-origin items that generally do not require an export permit</p>	<p>For further information, please refer to American Club Circular No. 23/21.</p> <p>For further information and guidance regarding US economic sanctions, please refer to the American Club website on economic sanctions by clicking here.</p>	<p>A copy of US sanctions regulations from the US Treasury Department can be found by clicking here.</p>
Crew Member Identification	<p>The USCG requires crew members on foreign commercial vessels calling on US ports or on US commercial vessels returning from a foreign port to have at least one type of acceptable identification available to be presented on demand.</p> <p>Such acceptable identification may include a passport, US permanent resident card, US merchant mariner document, US merchant mariner credential, TWIC, or a seafarer's identification document (SID) meeting the requirements of the International Labour Organization Seafarers' Identity Documents Convention.</p>	<p>A summary of the requirements for crew member identification can be found at the American Club website at Member Alert dated 29 April 2009.</p>	<p>The USCG regulations for Crew Member Identification may be found at 33 CFR Part 160, Subpart D by clicking here.</p>
Cyber Security	<p>As of January 1, 2021 both domestic and foreign flagged vessels are subject to USCG inspection to determine if cyber security safeguards are in place.</p>	<p>For further information and guidance security, the Club maintains a dedicated page on cyber awareness that can be found by clicking here.</p>	<p>A summary of the USCG's policy for compliance for both domestic and international flagged vessels can be found by clicking here.</p>

MARITIME SECURITY (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Calling at ports in the state of California: California Air Resource Board (CARB) Regulations	<p>The California Air Resources Board (CARB) has implemented regulations pertaining to (1) the sulfur content limits and types of fuels that can be used in California waters and (2) emission control regulation for use of vessel auxiliary engines while at-berth.</p> <p>(1) Fuel types and sulfur content limits are as follows:</p> <p>*MDO (ISO 8217, DMB Grade) or MGO (ISO 8217, DMA Grade) with a limit of 0.1% sulfur. Note should be taken that a marine distillate grade fuel is required.</p> <p>*Applies to all California waters within 24 NM of the California baseline. (Note that as of January 1, 2015, all vessels operating within the North American Emissions Control Area (approximately within 200 NM) have been required to burn low sulphur fuel oil, with a sulphur content of no more than 0.1%. See further below for requirements under MARPOL Annex VI.)</p> <p>* Of particular note, unlike the North American Emissions Control Area in which vessels may use scrubbers as a means of compliance, compliance with the CARB regulations may not be achieved through the use of scrubbers. More detailed guidance on the differences between the CARB regulations and the North American ECA regulations may be found by clicking here.</p> <p>*The requirements apply to auxiliary diesel and diesel-electric engines, main propulsion diesel engines, and auxiliary boilers on ocean-going vessels within</p>		<p>California Environmental Protection Agency's Ocean-Going Vessels Fuel Regulation can be found by clicking here.</p> <p>Information about the At Berth Regulation Program and Frequently Asked Questions can be found by clicking here.</p>

MARITIME SECURITY (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
	<p>Regulated California Waters (all waters within 24 nautical miles of the California baseline).</p> <p>(2) At Berth Emission Control Regulation:</p> <p>All ocean-going vessels visiting California marine terminals are subject to the 2020 At Berth Regulation (effective starting January 1, 2023). However, only container, refrigerated cargo, cruise, ro-ro, and tanker vessels have requirements to reduce emissions while at berth.</p> <p>Container, reefer, cruise ships have been so regulated since 2014, but starting January 1, 2023, ro-ro and tanker vessels will begin to implement emissions control measures. ro-ro (2025); tank vessels calling at LAX/LGB (2025) and all remaining tank vessels (2007). For vessel categories not subject to emissions control requirements (e.g., bulk and general cargo vessels), vessel operators must still meet visit reporting and opacity obligations as required by the 2020 Regulation.</p> <p>Vessels must switch to 0.1% MGO or MDO in all engines (main and auxiliary) within 24 nautical miles of the California Coast. The vessel must record the time and location of the switch to the low sulfur MDO/MGO. Furthermore, vessel visible stack emissions are monitored by shoreside inspectors and fines of up to US\$30,000 per violation may be issued if stack emissions are deemed excessive.</p>		

ENVIRONMENTAL PROTECTION

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Vessel General Permit—VGP (Commercial vessels of more than 79 feet in length)	<p>Members whose vessels trade in US waters should be aware that the Environmental Protection Agency (EPA) regulates the discharge of 26 different substances and liquids, incidental discharges into US waters (3 nautical miles for these purposes) through its 2013 Vessel General Permit (VGP), most of which had not been previously regulated or banned.</p> <p>All vessels calling on US ports must submit a Notice of Intent (NOI) to be covered by the VGP and implement the VGP's requirements for managing discharges on board the vessel. This involves inspections, monitoring, sampling, and record keeping. The USCG has established procedures to check for compliance with the VGP as part of its port state control exam. Deficiencies may be referred to the EPA for enforcement.</p>	<p>The American Club has developed an e-Learning module for Members and their senior crew to train and familiarize themselves with the VGP requirements. For more information and to gain access to these training modules for Members, click here.</p>	<p>The requirements can be found at the EPA website for the VGP by clicking here.</p> <p>We note that EPA's enforcement program has increased in the past few years, so owners should be vigilant in ensuring compliance with the 2013 VGP.</p> <p>The 2013 VGP will ultimately be replaced by the Vessel Incidental Discharge Act (VIDA), but implementation of VIDA is unlikely to occur until late 2025 at best.</p>

ENVIRONMENTAL PROTECTION (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Ballast Water Management	<p>The International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM) took effect on September 8, 2017. Since the US is not a party to the BWM Convention, US flag vessels and other vessels that trade in US waters need to comply with the applicable USCG and EPA requirements as set forth in EPA's 2013 Vessel General Permits.</p> <p>The USCG has established regulations for ballast water management to be implemented in US waters. The US regulations were published on March 23, 2012 and took effect on June 21, 2012. The ballast water management regulations, including the operational and recordkeeping requirements, and phased-in requirements for ballast water management systems, are contained in 33 CFR Part 151, Subparts C and D.</p> <p>Ballast water discharges are also governed by the EPA under the Vessel General Permit (see noted above).</p> <p>Vessels calling at California ports arriving from a port outside the Pacific Coast Region must exchange ballast water at least 200 NM from land. The maximum fine which can be levied by the state is up to US\$ 27,500 per tank depending on how far from "land" the discharge took place. California defines land as islands and even exposed rocks.</p>	<p>Please refer to:</p> <ul style="list-style-type: none"> • Member Alert dated 4 December 2020 • Member Alert dated 17 August 2020 • Club Circular No. 20/17 • Club Circular No. 01/17 	<p>The ballast water equipment, operational and recordkeeping requirements, contained in 33 CFR Part 151, Subpart D, may be accessed by clicking here.</p> <p>Ballast water management FAQs, general information, regulations & policy documents, information on the Alternative Management System (AMS), Shipboard Technology Evaluation Program (STEP), type approval requirements and Environmental Technology Verification System can be found at the following USCG link by clicking here.</p> <p><u>California only:</u> The California State Lands Commission maintains a Marine Invasive Species Program website provides information on what is required for vessels entering California state waters and also other relevant useful information related to biofouling management and can be accessed by clicking here.</p> <p><u>Vessel's transiting and operating in the Great Lakes and Hudson River only:</u> The requirements of 33 CFR Part 151, Subpart C can be found by clicking here.</p> <p>Amplifying guidance for the implementation of these ballast water regulations is provided in USCG NVIC 1-18 (dated March 1, 2018). This guidance may be accessed by clicking here.</p>

ENVIRONMENTAL PROTECTION (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
MARPOL Annexes I -VI	<p>The US is signatory to Annexes I, II, III, V and VI. Annexes I, II, V and VI have been incorporated into US law by the Act to Prevent Pollution from Ships (APPS) and implemented within 33 USC 1901 et seq. and 33 CFR 151. The US incorporates Annex III by the Hazardous Materials Transportation Act (HMTA) implemented within 46 USC 2101 and 49 CFR 171 -174 and 176.</p> <p>Although the US has not ratified Annex IV, the US has equivalent regulations for the treatment and discharge standards of shipboard sewage – the Federal Water Pollution Control Act (FWPCA) as amended by the Clean Water Act and implemented by 33 USC 1251 and 33 CFR 159.</p>	<p>The American Club has developed an e-Learning module for Members and their senior crew to train and familiarize themselves with the MARPOL Annexes I-VI requirements. For more information and to gain access to these training modules for Members, click here.</p>	<p>Currently, the US is signatory to MARPOL Annexes I, II, III, V and VI. MARPOL has been incorporated into US law by the APPS and implemented within 33 USC 1901 and 33 CFR 151.</p> <p>Additional resources to assist Members with compliance with MARPOL Annexes I through VI while in the US can be found by clicking here.</p>

ENVIRONMENTAL PROTECTION (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
MARPOL Annex VI: North American Emission Control Area (ECA) US Coast Guard Office of Commercial Vessel Compliance	<p>MARPOL establishes Emission Control Areas (ECAs) in the Baltic Sea, North Sea, US Caribbean Sea, and most of the US and Canadian coasts in which stricter controls are applicable on emissions of sulphur oxide (SO_x), nitrogen oxide (NO_x), and particulate matter. Since January 1, 2015, all vessels operating in such ECAs have been required to burn low sulphur fuel oil, with a sulphur content of no more than 0.1% or meet equivalent requirements, such as using exhaust gas cleaning systems (or scrubbers).</p> <p>As of January 1, 2020, regulated ships sailing anywhere in the world outside of an ECA are required to use fuel oil with a sulphur content of no more than 0.50%. In some cases, ships can become compliant with the ECA requirements by using approved equivalent methods, such as exhaust gas cleaning systems or "scrubbers", which reduce emissions before they are released into the atmosphere.</p> <p>The applicable US regulations for MARPOL Annex VI are contained in 40 CFR Part 1043.</p>	<p>For guidance on the implementation of the 2015 ECA requirements, please refer to:</p> <ul style="list-style-type: none"> • Club Circular No. 39/14 • Member Alert dated 30 March 2015 • Member Alert dated 23 January 2017 <p>The American Club has developed an e-Learning module for Members and their senior crew to train and familiarize themselves with the MARPOL Annex VI requirements. For more information and to gain access to these training modules for Members can be found by clicking here.</p>	<p>The EPA has launched an electronic portal through which vessel owners and operators of vessels can submit a disclosure of fuel oil non-availability. The portal can be accessed by clicking here.</p> <p>All updates regarding US EPA compliance guidance can be found by clicking here.</p> <p>In addition, the EPA has issued a penalty policy for violations by ships of the sulfur in fuel standard and related provisions. This policy can be found by clicking here.</p> <p>Finally, amendments to MARPOL Annex VI pertaining to data collection for fuel oil consumption of vessels entered into force on March 1, 2018. More information on the amendments is available by clicking here.</p>

ENVIRONMENTAL PROTECTION (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Non-Tank Vessel Response Plans (NTVRP)	<p>Shipowners are required to file a Vessel Response Plan under this rule and either have received approval of the plan or have filed a plan containing sufficient elements to obtain Interim Operating authorization. Shipowners are required to enter into salvage and firefighting agreements which involve detailed agreements, including performance standards.</p> <p>NTVRP contracts must be specific to geographic areas on the US coastline where the vessels operate.</p> <p>Members must be particularly cognizant of required salvage and marine firefighting services capabilities and required response times in 33 CFR Part 155, Subpart I.</p>	<p>The following Club Circulars detail the steps by which shipowners are to comply with the NTVRP requirements:</p> <ul style="list-style-type: none"> • 2018 OSROs updates for Hawaii: Club Circular No. 33/17. • 2016 updates the response plans for Alaska and Oregon: Club Circular No. 21/16. • General NTVRP requirements: Club Circular No. 05/14. • Alternative response plan requirement (Alaska and Guam only): Club Circular No. 13/15. • Alternative NTVRP (Alaska only): Club Circular No. 07/14. • Additional NTVRP contingency plan requirements (Alaska and Washington state only): Club Circular No. 40/13. <p>Regarding the California CASP requirements (California only): See Club Circular No. 47/15.</p>	<p>A detailed summary of both federal and state-by-state requirements for non-tank vessel response planning can be found by clicking here.</p>

ENVIRONMENTAL PROTECTION (cont.)

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Tank Vessel Response Plan	<p>As per 33 CFR Part 155, Subpart D - Tank Vessel Response Plans for Oil, all foreign tank vessels calling on ports in the United States, and all US flagged tank vessels, are required by OPA 90 to have an approved oil spill response plan. Tank vessel response plan regulations, including plan submission requirements, are located in 33 CFR 155, Subpart D.</p> <p>Members must be particularly cognizant of required salvage and marine firefighting services capabilities and required response times in 33 CFR Part 155, Subpart I.</p>	<p>2018 OSROs updates for Hawaii: Club Circular No. 33/17.</p>	<p>A detailed summary of both federal and state-by-state requirements for tanker vessel response planning can be found by clicking here.</p>
Asian Gypsy Moth	<p>The United States Department of Agriculture (USDA) has recently issued “Special Procedures for Suspect Asian Gypsy Moth (AGM) Ships” from its Manual for Agricultural Clearance, as attached. The Manual provides Customs and Border Protection (CBP) personnel at relevant locations with policy and protocol guidelines to prevent the invasion of pests which threaten US agriculture.</p> <p>The procedures followed in the US depend upon the date of vessel’s calls in the AGM areas and the port where the vessel calls the US. Generally, in West Coast US ports, a lack of an AGM certificate does not mean that the vessel will not be cleared for entry, but it will be subject to inspection on or near the time of arrival.</p>	<p>In addition, see the Club’s Currents publication, The Asian Gypsy Moth Season is Upon Us.</p>	<p>A pocket guide for inspecting vessels for the Asian Gypsy Moth can be found by clicking here.</p> <p>USDA and Canadian Food Inspection Agency 2022 notice on the Asian Gypsy Moth can be found by clicking here.</p> <p>The USDA Manual for Agricultural Clearance can be found by clicking here.</p> <p>BIMCO’s “Introduction to Asian Gypsy Moth” and other relevant sources can be found by clicking here.</p>

LIABILITY

Subject	Summary	American Club guidance/references	Other relevant guidance/references
Certificate of Financial Responsibility (COFR)	<p>COFRs are required for both tank and non-tank vessels calling US waters. A COFR is issued to vessel operators who have demonstrated their ability to pay for cleanup and damage costs up to the liability limits required by the Oil Pollution Act of 1990 (OPA 90).</p> <p>With a few limited exceptions, vessels greater than 300 GT and vessels of any size that are lightering or transshipping oil in the Exclusive Economic Zone are required to comply with the COFR regulations.</p> <p>The COFR program is administered by the USCG's National Pollution Funds Center (NPFC). The Vessel Certification Division of the NPFC ensures that responsible parties are identified and held responsible for the expenses incurred during a water pollution incident.</p> <p>COFRs for certain states, e.g. California, require separate application to relevant state agencies.</p>	<p>Members are encouraged to refer to the following Club Circular regarding requirements for California COFRs: Club Circular No. 06/13.</p>	<p>The NPFC is tasked with administering the vessel financial responsibility portions of the Oil Pollution Act of 1990 (OPA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The NPFC website summarizes the COFR program and provides details on COFR applications and can be found by clicking here.</p> <p>Further information in obtaining COFRs can also be found from COFR guarantors such as, but not limited to, the following:</p> <ul style="list-style-type: none"> • SIGCo • Shoreline Ltd. • WQIS • Great American Insurance Group (COFR-Rite) • Safe Harbor Pollution Insurance • COFRs requirements for the State of California



American Steamship Owners Mutual Protection & Indemnity Association, Inc.

Shipowners Claims Bureau, Inc., Manager

New York

tel +1 212 847 4500 fax +1 212 847 4599
email info@american-club.com web www.american-club.com

Houston

tel +1 346 223 9900
email claims@american-club.com

Shipowners Claims Bureau (UK) Ltd.

London

tel +44 20 7709 1390
email claims@scb-uk.com

Shipowners Claims Bureau (Hellas), Inc.

Piraeus

tel +30 210 429 4990 fax +30 210 429 4187
email claims@scb-hellas.com

SCB Management Consulting Services, Ltd.

Hong Kong

tel +852 3905 2150
email hkinfo@scbmcs.com

SCB Management Consulting (China) Co., Ltd.

Shanghai

tel +86 21 3366 5000 fax +86 21 3366 6100
email claims@scbmcs.com