

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Board For Branch Pilots
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	18 VAC 45-20
<b>VAC Chapter title(s)</b>	Board for Branch Pilots Regulations
<b>Action title</b>	Periodic Review
<b>Date this document prepared</b>	June 23, 2023
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Periodic Review

**Cost Benefit Analysis**

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

## **Impact on Local Partners**

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

### **Description of Impact on Local Partners**

- **DEQ** – The Department of Environmental Quality may be impacted if the regulations were changed to not require licensing of branch pilots. Pilots maneuvering their ships through unknown Virginia waters may cause collisions which may impact the supply chain, including food, automobiles, etc.
- **USCG** – The United States Coast Guard would be directly impacted if the regulations were changed. There may be more incidents/accidents where lives are at stake.

## **Impacts on Families**

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

### **Description of Impact on Families**

- Families of the branch pilots could be impacted by regulatory change. A branch pilot's career would be severely impacted if regulations remove the branch pilots from commandeering vessels/ships arriving in Virginia waterways. A branch pilot's career is very specialized, and they would not find employment so they would need to move to another state.
- In addition, if container ships are not able to reach the ports because of regulatory changes, the public may not be able to acquire their needed products, food, medicine, etc.

## **Impacts on Small Businesses**

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

### **Description of Impact on Small Businesses**

- Each branch pilot is considered an entity, thus a small business. Any changes to the regulations will have a direct effect on the branch pilots. If regulations are removed, the branch pilots could be unemployed.
- As stated above, if container ships are not able to reach the ports because of regulatory changes, small businesses may not be able to acquire their needed products, food, medicine, etc. to sell to the public.

**Changes to Number of Regulatory Requirements**

**Not applicable.**