



Before the House Committee on Labor
Representative Jackson D. Sayama, Chair
Representative Mike Lee, Vice Chair

Tuesday, March 24, 2026

Re: S.B. 3215, H.D. 1 – Relating to Harbor Safety
Position: Oppose

Chair Sayama, Vice Chair Lee, and Members of the Committee:

My name is Antoinette Davis, and I have had the honor of serving as Executive Director of the Activities & Attractions Association of Hawai'i (A3H), a nonprofit 501(c)(6) trade organization, since 1997.

A3H respectfully opposes S.B. 3215, H.D. 1, which repeals the sunset provisions of Act 236, Session Laws of Hawai'i 2024, and would make permanent the requirement that the Department of Transportation ensure that the securing of mooring lines from vessels to commercial docks, wharves, piers, quays, and landings be performed by labor subject to collective bargaining.

Harbor safety is important, and A3H supports proper training, skills, and safe operating practices in our commercial harbors. However, this bill makes what was adopted as a temporary requirement permanent without establishing a broader competency-based standard or certification pathway. Instead, it imposes a rigid labor mandate that limits who may perform mooring work based on collective bargaining status.

This approach adds regulatory burden, cost, and inefficiency to doing business in Hawai'i. For many local businesses, including those connected to the activities, attractions, and visitor industry, timely harbor operations are critical to the movement of goods, equipment, supplies, and other materials needed to serve residents and visitors. Any delay in loading or offloading vessels can create downstream impacts throughout the economy.

In some locations, union labor may not always be available with the speed and responsiveness required when ships arrive. In addition, some importers, operators, and vessel crews may already have personnel who are trained, experienced, and capable of safely assisting with mooring and offloading operations. A blanket mandate that this work be performed only by labor subject to collective bargaining may unnecessarily block qualified personnel from doing the work, even where safety can still be fully protected.

If the Legislature's goal is harbor safety, a better approach would be to establish clear training, certification, and operational standards for anyone performing mooring work, rather than permanently mandating that the work be limited to one category of labor. Safety should be driven by competence and accountability, not by a one-size-fits-all labor restriction.



At a time when Hawai'i continues to struggle with affordability and high operating costs, the State should avoid policies that increase expenses and create bottlenecks in essential harbor operations.

For these reasons, A3H respectfully opposes S.B. 3215, H.D. 1, and asks that this measure be deferred.

Mahalo for the opportunity to testify.

Toni

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