

UK P&I CLUB



# LP Bulletin

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## Bulletin 746 - 03/11 - Crew ILO documentation UPDATE - Brazil

**Brazilian authorities have agreed to suspend the implementation of immigration fines against ship owners whose seafarers are from countries which are not signatories to ILO C108 (Seafarers Identification Document Convention 1958) or C185 (Seafarers Identification Document Convention 2003).**

In a circular issued to all P&I Clubs by Mario Brothers, Ltd. it was stated that *“Recife Immigration Authorities received formal instructions from the Federal Police headquarters in Brasilia this afternoon (21 January 2011) to SUSPEND all the deeds of infringements against crewmembers with seaman’s books issued in countries not signatory of ILO 108 and 185. Future vessels will also not be fined until authorities in Brasilia make a formal definitive decision.”*

In December 2010, Brazilian authorities in the ports of Suape and Recife started imposing immigration fines and restrictions on seafarers from countries which are not signatories to ILO C108 or C185. These seafarers were prohibited from disembarking from their ships and entering Brazilian ports and immigration fines were levied on ship owners supplying these foreign seafarers. The fines amounted to BRL 827,000 (USD 500) for every non-complying crewmember.

According to Mario Brothers Ltd., P&I Clubs of Brazil together with local port agents negotiated with Brazil’s Chief of Immigration to resolve the issue which has caused political reactions from those countries affected.

The Philippines has not ratified C108 or C185 thus exposing foreign ship owners and their Filipino crew members to sanctions. The JMG has made strong representations with the different Philippine government agencies, particularly the Maritime Industry Authority, the Department of Labour and Employment and the Department of Foreign Affairs, in order to help resolve the problem and move towards the early ratification of C185 by the Philippine Senate. C185 is the current convention of the ILO which remains to be ratified by the Philippine Senate.

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