



Vigilandum est semper; multae insidiae sunt bonis.

CMI Newsletter

Table of Content

- 1. President's letter: Postponement of Tokyo Conference to 2025, October 2022 Antwerp Conference, Russian MLA, New Titulary and Executive Council Members, and Judicial Sales – by Chris Davis**
- 2. Report of meetings of the International Organizations**
 - a. IMO LEG 108 – by Rosalie Balkin
 - b. IOPC Funds: Meeting of the Governing Bodies (July 2021) – by Patrick Griggs
 - c. UNCITRAL Judicial Sales – by Ann Fenech
 - d. Report of the IWG on Unified Interpretation on the Test for Breaking the Shipowner's Right to Limit Liability including Draft Resolution on the Interpretation of Article 4 of LLMC 1976 – by Dieter Schwampe
- 3. NMLA Bulletin board**
 - a. Canada – by Paul Harquail
 - b. AIDIM – by Giorgio Berlingieri
 - c. Croatia – by Igor Vio
- 4. Getting to know your EXCO – Profile Aurelio Fernandez-Concheso**
- 5. Young Person's Essay Prize – by John Hare**
- 6. Foundation Albert Lilar – by Benoit Goemans**
- 7. Obituaries**
 - a) Javier Galiano – by Chris Davis
 - b) Tulio Alvarez Ledo – by José Alfredo Sabatino Pizzolante

-
1. Postponement of Tokyo Conference to 2025, October 2022 Antwerp Conference, Russian MLA, New Titulary and Executive Council Members, and Judicial Sales – by Chris Davis



COMITÉ MARITIME INTERNATIONAL
PRESIDENT

4 October 2021

MLA Presidents
Titulary Members
Consultative Members

Re: Postponement of Tokyo Conference to 2025, October 2022 Antwerp Conference, Russian MLA, New Titulary and Executive Council Members, and Judicial Sales

Dear Presidents, Titulary Members and Consultative Members,

I write to confirm the decision taken by the Assembly on 30 September 2021 to postpone the Tokyo Conference from 5-8 April 2022 to 2025, as recommended by the Japanese Maritime Law Association, the Tokyo Conference Organizing Committee, and the Executive Council. As discussed during our virtual meeting, the ongoing pandemic, uneven vaccination rates around the world, uncertainty as to when the Japanese Government would relax existing travel and quarantine restrictions, and the New Otani Hotel's September 2021 cancellation deadline, convinced us all it was unrealistic to host an in-person Conference in the Spring of 2022. Fortunately, the Japanese MLA and sponsors who had committed to support the Tokyo Conference have agreed to postpone the event until 2025 (a decision endorsed by the Executive Council and the Assembly), which will undoubtedly be a memorable event.



In the meantime, we are very much looking forward to welcoming delegates in Antwerp during the third week of October 2022 to celebrate the CMI's 125th anniversary. The Antwerp event has been upgraded to a conference since the Assembly will be asked to vote on General Average guidelines and security wordings which the Standing Committee on General Average is in the process of finalizing. Additionally, the Assembly will be asked to approve certain changes to the CMI's Constitution which are required to keep us in compliance with the new Belgian Companies Act. Further details on the work programme and social events for the Antwerp Conference will be provided in due course. In the meantime, the Antwerp Conference Organizing Committee is scheduled to hold a video conference on 5 October 2021, and will be

meeting virtually on a monthly basis to finalize the Conference arrangements. Pictures of the venue in Antwerp: <https://www.aroomwithazoo.com/en/rooms-facilities/>



Picture: CMI Management Committee at work in CMI HQ— left to right (from left to right: Chris O. Davis, Rosalie Balkin, Lawrence Teh, Peter Verstuyft, Taco Van der Valk, Ann Fenech, Dieter Schwampe)

I take this opportunity to offer a warm welcome to the Russian Maritime Law Association (RUMLA) which was formally approved for CMI membership by the Assembly on 30 September 2021. We very much look forward to working with RUMLA on issues of mutual interest, and the participation of RUMLA's members in the work of the CMI going forward.

Likewise, congratulations are in order to the eight new Titulary Members whose applications were approved by the Assembly last week:

Prof. Manuel Alba (Spanish MLA)
Mr. Jesus Casas (Spanish MLA)
Mrs. Mercedes Duch (Spanish MLA)
Mr. Javier Portales (Spanish MLA)
Ms. Barbara Holland (US MLA)
Mr. Jan-Erik Pötschke (German MLA)
Mr. Dragan Bolanca (Croatian MLA)
Mrs. Dorotea Coric (Croatian MLA)

We also welcome two new members to the Executive Council, Paula Backden of the Swedish MLA and Petar Kragic of the Croatian MLA, and offer our heartfelt appreciation and thanks to Luc Grellet and Taco van der Valk who completed their second term as Executive Councillors, but will continue to contribute to the work of the CMI as members of Standing Committees and/or International Working Groups.

Finally, I am attaching for your review and further action the latest Annotated Fourth Revision of the Beijing Draft (which is no longer marked as "Advanced Copy"), and the revised CMI meeting notes dated 1 October 2021, which I received from Ann Fenech earlier today and have been prepared to assist you and your respective Government representatives ahead of the 39th Session of UNCITRAL Working Group VI on Judicial Sales scheduled for 18-23 October 2021.

On behalf of the Executive Council, thank you for your continued participation in the work of the CMI, and we very much look forward to seeing you in person next year in Antwerp.

Faithfully yours,

Christopher O. Davis

cc: Executive Committee

2. Report of meetings of the International Organizations

a. IMO LEG 108 – by Rosalie Balkin

As with other IMO sessions during this time of Covid-19, the 108th session of the IMO Legal Committee (LEG 108) was held remotely from 26th July to 11th August 2021. The session was opened by the IMO Secretary-General, chaired by Mr Volker Schofisch (Germany) and attended by several CMI delegates.

The items of interest included a number of submissions on the **Fair Treatment of Seafarers**. Document LEG 108/4(a), submitted by the ILO and IMO Secretariats, reported on the **IMO/ILO joint database of abandonment of seafarers** for the period 1 January-1 April 2021. During this period, 111 new cases had been reported, with 85 in 2020 and 26 cases in the first quarter of 2021, of which only 43 had been resolved. A further 27 cases had additionally been reported in the three months leading up to LEG 108, bringing the total number of new cases in 2021 to 53, thereby alarmingly surpassing the previous year's record of reported abandonment cases. Several (18) were related to the consequences of the Covid-19 pandemic, and further exacerbated the crew change situation.

The document described some of the cases which, in order to obtain resolution, had necessitated the substantial involvement of IMO, ILO, ITF and ICS. One of these was the **MV Ula** the crew of which had been detained on board for almost two years in difficult circumstances and who had finally been repatriated without their wages being paid (although the Kuwaiti authorities had given an undertaking in relation to these claims).

The statistics for the period 1 January-31 December 2020 provided in Document LEG 108/4(a)/1, submitted by ITF, are also revealing, namely: 85 cases of abandonment involving over 1300 seafarers on 53 vessels.

Among the views expressed by the Committee in discussing this situation were:

- The dramatic increase in abandonment cases could only partially be attributed to Covid-19;
- Four years after the entry into force of the 2014 amendments to MLC 2006, the maritime crisis caused by Covid-19 had revealed that there was still a large proportion of shipowners who continued to operate without the required financial insurance;
- Seafarers from India were on top of the list of abandoned seafarers;
- Although the role of ITF (and other agencies) was important, flag states had a pivotal role in resolving the issues and this was a systemic issue which needed to be resolved;
- Safety of the port and repatriation of seafarers are not mutually exclusive and MLC 2006 should not be overridden by safety considerations.

Following the discussion, the Committee encouraged Member States to assist with the crew change crisis and *inter alia* reminded Member States of United Nations General Assembly Resolution A/75/17 adopted on 1 December 2020 on *International cooperation to address challenges faced by seafarers as a result of the Covid-19 pandemic to support global supply chains*.

Leg 108 was updated by ILO on the Committee's proposal that the Special Tripartite Committee (STC) of MLC 2006 authorise **the establishment of an ILO-IMO tripartite working group to identify and address seafarers' issues and the human element** (which would need to be endorsed by the ILO Governing Body during its meeting in November 2021).

This proposal had been discussed and positively received at the fourth meeting of the STC, with firm support for work on the two issues identified in the IMO proposal, namely, fair treatment of seafarers detained on suspicion of committing maritime crimes and guidelines on how to deal with seafarer abandonment cases.

It was explained that the next step would be for the ILO and IMO Secretariats to draw up a draft resolution recommending the establishment of a joint IMO-ILO Working Group, including its terms of reference which, once adopted by STC, would be submitted to the ILO Governing Body for decision. In this connection, Leg 108 recalled that the IMO Council at its 125th session had endorsed the decision of the Maritime Safety Committee to approve in principle the establishment of a standing joint IMO-ILO

Working Group to identify and address seafarers' issues and the human element, subject to the approval of the group's method of work as provided for in the resolution to be adopted by ILO.

Leg 108 also discussed a **proposal submitted by China, the Philippines and Indonesia to establish a working group for the development of guidelines for port State and flag State authorities on how to deal with seafarer abandonment cases, including the possible establishment of a Seafarers Emergency Mutual Fund** (Document LEG 108/4(d)).

On the basis that the guidelines should not replace the statutory provisions established through MLC 2006 as the central focus of any discussion on abandonment of seafarers, the Committee considered that any working group should be established on a tripartite basis with the ILO and, in order to progress the work in relation to the Committee's outputs prior to LEG 109, consequently agreed to recommend to the ILO Governing Body that it approve the formation of a joint IMO-ILO working group at its 343rd session.

The Committee also invited Member States to submit proposals for a new output regarding the establishment of a Seafarers Emergency Mutual Fund to LEG 109 for consideration.

It further agreed to establish an intersessional Correspondence Group, under the coordination of Indonesia, to progress the work on the output on Guidelines for port State and flag State authorities on how to deal with abandonment cases, taking into account the views discussed in the Committee, and to report back to the next session of LEG. In particular, the Guidelines should focus on the practical implementation of existing international instruments rather than aim at substituting them.

The Committee then discussed Document LEG 108/5 in which the **IOPC Funds had provided an update on the work carried out in relation to the problems encountered in some oil pollution incidents involving insurers who were not members of the International Group of P&I Clubs**. It agreed that the issue of inadequate insurance merited further consideration at its future sessions and welcomed the statement by the delegation of Canada to the effect that it would be submitting a proposal at LEG 109 for a new output in this regard.

The Committee considered a number of submissions relating to the **fraudulent registration and fraudulent registries of ships**, in particular the report of a Correspondence Group under the coordination of the USA which had been established at LEG 106 (Document LEG 108/6). While considerable progress had been made, particularly with the definitions of "fraudulent registration" and "fraudulent registries", there were still a number of issues canvassed in the various submissions that remained to be resolved (including a definition of "false documents" as proposed by China in Document LEG 108/6/1). An intersessional Correspondence Group was established for this purpose with a 2022 target date for completion of this work.

The Committee approved a draft Assembly resolution on "Encouragement of Member States and all relevant stakeholders for the prevention and suppression of fraudulent registration and fraudulent registries and other fraudulent acts in the maritime sector" for submission to the IMO Council at its 34th extraordinary session and thereafter to the 32nd session of the IMO Assembly for approval and adoption. The decision to obtain Assembly approval rather than have the resolution adopted by the Legal Committee was based on the fact that some of its operative paragraphs touched on matters that fell within the purview of other IMO organs.

The Committee then turned its attention to the **regulatory scoping exercise (RSE) and gap analysis of conventions emanating from the Legal Committee with respect to maritime autonomous ships (MASS)**, which had been put on hold at the last LEG session due to insufficient time.

The committee had before it fifteen reports submitted by member States in relation to the RSE for each individual instrument that was reviewed; two documents providing a summary of the results of the RSE, including **Document LEG 107/8** and its corrigendum **submitted by the CMI**; Document LEG 107/8/18 submitted by IFSMA commenting on the role of the master, which had been identified as a common potential gap during the RSE undertaken by the Legal Committee, the Maritime Safety Committee (MSC) and the Facilitation Committee (FAL); two Secretariat document reporting on the progress made by MSC and FAL for the instruments under their purview; and a submission by the Russian Federation commenting on the legal regulation of MASS trials in the Russian Federation. The Secretariat also provided oral updates on the work of MSC and FAL.

The ensuing discussion focused on the way forward once the LEG RSE had been finalized. To this end the Committee re-established the LEG Working Group on MASS, which reported back to the Committee before the end of the session, thereby enabling the Committee to approve the outcome of the RSE and gap analysis of conventions emanating from the Legal Committee with respect to MASS.

Of particular interest was the WG's assessment that MASS could be accommodated within the existing framework of LEG regulations without the need for major adjustments but that coordination among the various IMO committees would be necessary, in particular, regarding terminology and definitions. Further, conventions not under the auspices of IMO, such as UNCLOS and MLC 2006, may need to be considered in IMO's future work on MASS, especially if IMO were to develop an instrument regulating MASS operations.

The Committee's consideration of **Unified interpretation on the test for breaking the owner's right to limit liability under the IMO conventions** was another matter which may be of particular interest to JMLA and CMI readers.

This issue has been under consideration since LEG 106 and included a review of the *travaux préparatoires* of the various IMO liability and compensation conventions, as well as other related historical documents that had identified consistent themes and principles which highlighted the virtually unbreakable nature of the test. At LEG 107 the Committee had considered the possible mechanisms for the adoption of a Unified Interpretation on the test based on article 31(a) and (b) of the Vienna Convention on the Law of Treaties (Vienna Convention) as well as on the work of the International Law Commission (ILC) on subsequent agreements and subsequent practice in relation to the interpretation of treaties.

CMI's position on the subject was set out in LEG 107/9/1.

LEG 107 had also set up a remote Correspondence Group under the coordination of Georgia, which submitted its report to LEG 108 for its consideration (Document LEG 108/8). The report contained *inter alia* a draft resolution on the interpretation of article 4 of the 1976 Convention on Limitation of Maritime Claims, article V(2) of the 1992 Civil Liability Convention and article 9 of the 2010 Hazardous and Noxious substances Convention (which is yet to enter into force). All of these provisions refer to conduct barring limitation. It also considered three possible options for the vehicle with which to adopt the draft resolution.

In relation to this last point, Document LEG 108/8/1 issued by the Secretariat explained that the resolution could be adopted by either the IMO Assembly or by the Legal Committee and that it was not necessary to convene a conference of States Parties for this purpose. It recommended that, as States Parties to a treaty were the best interpreters of their own agreement, and in accordance with the views of the ILC, the wording of the resolution should reflect that it represented the views of States Parties.

On this issue CMI, represented by Prof Dr Dieter Schwampe, Vice President, explained that CMI had a particular interest in this subject, having been heavily involved in the drafting of article 4 of LLMC 1976, the text of which remains unchanged in the 1996 LLMC Protocol. Additionally CMI had set up an International Working Group (IWG) on Unified Interpretation of which he was one of its two Chairs, comprised of members from France, Greece, Ireland, Spain, the United Kingdom, the United States and Venezuela. He noted CMI's support for the text as drafted by the Correspondence Group. In this regard he noted that, given the significance of the test for breaking the owner's right to limit liability, and bearing in mind that article 31(3)(a) of the Vienna Convention refers to the "subsequent agreement *between the parties* regarding the interpretation of the treaty", CMI supported the option that carried the greatest legal weight, namely a resolution by the States Parties to the respective conventions. He also stated CMI's preferred view that the resolution be an IMO Assembly resolution rather than one of the Legal Committee alone and that a separate resolution be adopted in respect of each of the conventions to which it would apply rather than adopt one resolution covering all of the relevant conventions. CMI's preferred view therefore was that the resolution in respect of each of the respective conventions begin with the words: "The States Parties to the Convention...".

Following an animated discussion, the Committee decided that, as there were different States Parties to each of the conventions under discussion, it was preferable for separate resolutions for each of those conventions to be adopted rather than just one resolution covering all of them. It further decided that the IMO Assembly was the appropriate forum for these resolutions to be adopted. A Drafting Group was then established to finalize the draft resolutions, taking the above-mentioned factors into account. It reported back to the Committee before the end of the session, which enabled the Committee to approve the texts of draft resolutions pertaining to the 1976 LLMC; the 1992 Protocol to the 1976 LLMC; and the 1992 Civil Liability Convention. However, as the 2010 Hazardous and Noxious substances Convention is not yet in force, and thus has as yet no States Parties, the Committee decided not to draft any resolution in respect of that convention.

The Committee considered **two possible new work outputs** to include in its 2022-2023 biennial agenda. The first of these was a proposal by Australia on the **development of measures to assess the need to amend liability limits**; the second was a proposal by Canada, Finland, Spain, the United

Arab Emirates, the P&I Clubs, ITOPH and ICS for the **development of a Claims Manual for the 2001 Bunker Oil Pollution Convention**.

The Committee agreed to both of these proposed new outputs and invited concrete proposals to LEG 109 for consideration on the scope of the work involved in each of them.

Mr Volker Schofisch, who had served as Chair of the Committee from 2018-2021 announced his retirement and accordingly the Committee elected as the **new Chair for 2022 Ms Gillian Grant (Canada)**—the first woman to serve as such; it also elected a **new Vice-Chair, Mr Ivane Abashidze (Georgia)**.

As to the meeting dates of forthcoming LEG sessions, the Committee agreed that two meetings over the next (2022-2023) biennium should be sufficient. The date for LEG 109 is yet to be announced.

b. IOPC Funds: Meeting of the Governing Bodies (July 2021) – by Patrick Griggs

This series of meetings was held (remotely) on Thursday 22nd and Friday 23rd 2021. The new Chairperson of the meeting of the 1992 Fund Administrative Council (elected at the Funds' March meeting) was Ambassador Antonio Bandini (Italy). The Chairperson of the Executive Committee was Ms. Gillian Grant (Canada). For the meeting involving the Supplementary Fund the Chairperson was Mr. Sungbum Kim (Republic of Korea).

1992 Fund Executive Committee.

Report of the Director.

The Director stated that the main objective of this meeting was to decide on the ballot procedure which would be followed in choosing his successor though, in addition, delegates would need to make important decisions concerning a recent incident in Israel.

Appointment of the Director.

The procedure for appointing a new Director is well established but is based on delegates being able to attend meetings in person. That procedure will be followed at the November meeting provided Covid – 19 restrictions permit and delegates are able to attend the meeting at IMO Headquarters. After a lengthy debate it was decided that in the event of delegates not being permitted to attend in person voting would be “by appointment”. This would involve the opening of a room at IMO Headquarters where delegates from member states could attend, by appointment, and vote in person. Prior to the ballot being opened candidates for the post of Director would be given the opportunity of briefly presenting the case for their appointment. These presentations would be scheduled for Tuesday November 2nd (the day before the first ballot) and might need to be “virtual”.

Incident in Israel.

In February 2021 the Government of Israel requested assistance from the 1992 Fund in connection with oil which had come ashore on the Israeli coastline. The source of the pollution was not immediately known but was thought to have originated within the Israeli EEZ. Clean-up operations had been co-ordinated by the Marine Environment Protection Division of the Ministry of the Environment. In addition local authorities had taken responsibility for cleaning the beaches. (At one stage up to 12,000 volunteers were involved with clean-up operations.) Laboratory analysis of oil samples in Israel had established that the pollutant was crude oil and the assumption was that it had come from a tanker coming within the definition of a “ship” under the 1992 Civil Liability Convention.

Experts appointed by the Fund confirmed these findings and concluded that the pollution resulted from the illegal dumping of crude oil washings from an unknown tanker. (Further research suggests that the pollution may have come from the tanker *MT Emerald* though the evidence for this is circumstantial.) No claims have yet been submitted but the cost of clean-up is estimated at £12.1 million with the probability of further claims for economic loss.

At its meeting in October 2002 the Fund had decided that the 1992 CLC would apply to spills of persistent oil even if the ship from which the oil came could not be identified.

After some discussion delegates agreed to authorise the Director to pay compensation in respect of admissible claims but also requested that in conjunction with the Israeli government he should continue with efforts to identify the responsible tanker and attempt to recover from its owners or their insurers

amounts paid out by the Fund.

General matters.

The Director referred to the retirement of Mr. Volker Schofisch who had been leader of the German delegation to Fund meetings since 2001 and had represented the “quiet voice of reason” in many debates.

The next meeting of the IOPC Funds will take place (either face to face or remotely) in the week beginning November 1st 2021.

c. UNCITRAL Judicial Sales update September 2021 – by Ann Fenech



In our last newsletter published in March 2021, I had reported on the 37th Working Group V1 UNCITRAL meeting that had taken place in Vienna virtually and at which some very successful deliberations were had on the annotated 2nd revision of the Beijing Draft on the effect of Judicial sales.

Since then we have had one further session. The 38th meeting has taken place in April 2021 and the 39th is scheduled to take place in a couple of weeks time. To say that we are excited about this project is an understatement because it is most gratifying for our working group to see our project reaching this stage.

The April meeting was very successful indeed notwithstanding the challenging circumstances particularly because the delegates were unable to meet together in person at the same time during the various breaks and have side meetings. The fact that delegations participated virtually from their own countries in their own time zones meant that there were delegates from Austral Asia needing to burn the mid night oil, whilst those from the Americas having to wake up in the very early hours of the morning to make the 2pm – 5pm CET session held every day. It was therefore important to make up for this by creating various Whats App accounts so we could still exchange views between us!

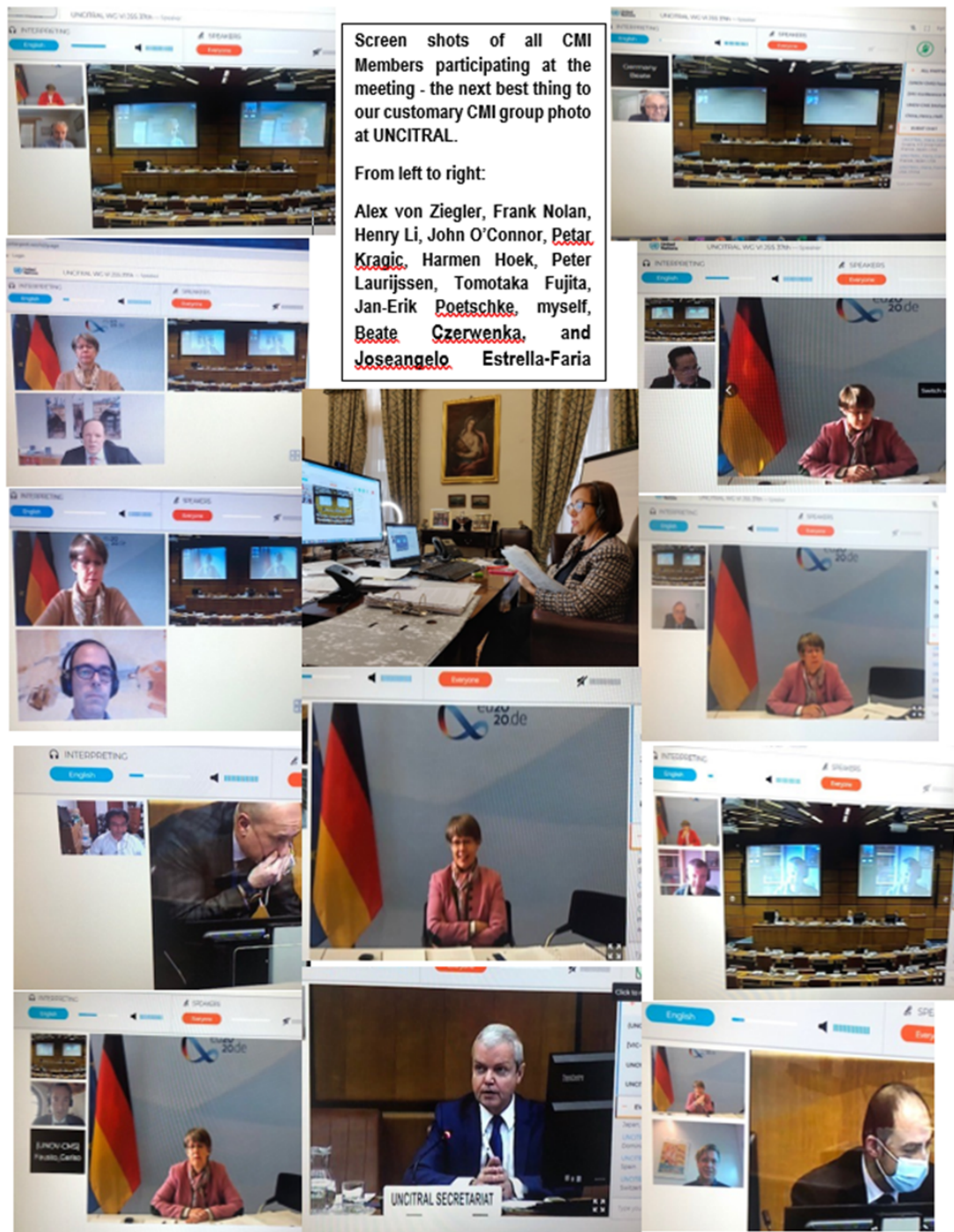
Apart from myself representing CMI and speaking for CMI, we had Alex von Ziegler as the representative for Switzerland, Frank Nolan a member of the US delegation, Tomotaka Fujita the representative for Japan, Henry Li the representative for China, John O'Connor a member of the Canadian delegation, Jan-Erik Poetschke a member of the German delegation, Manuel Alba a member of the Spanish delegation and Peter Kragic a member of the Croatian delegation. An equally important role was played by other CMI members who were not State representatives but representing important NGO's - Peter Laurijssen the representative for the International Chamber of Shipping and BIMCO and Harmen Hoek the representative for the IBA. I would also like to also mention specifically Margo Harris from Law Asia and Mr. Justice McKerracher as the representative of the International Association of Judges for their support and interventions. Thanks must also go to the support offered by Jan de Boer as the representative of the IMO and Angele Sears Debono, the representative of the European Union. I am happy to report that most of the recommendations of the CMI were accepted and the CMI was during the course of the sessions able to assist with suggesting wording with a view to addressing concerns raised by other delegations. Importantly major issues of principle have been decided by consensus. This has enabled the Secretariat to provide the ***Annotated 4th Revision of the Beijing Draft*** which has been circulated

Credit must go to the Secretariat which has been repeatedly able to sift through the various comments, thoughts and ideas being deliberated and produce narrative which very frequently captures what delegations had in mind leading to consensus. Credit must also be given to the Chair of the session Dr. Beate Czerwenka who notwithstanding the tight and limited official times between 2pm and 5 pm successfully held informal online sessions on a daily basis so that we could further our deliberations.

The progress registered was significant to the extent that in its report to the 54th Session of the Commission, the Secretariat reported that it was hoping to finalise a final draft in the remaining two sessions for presentation to the Commission in May of 2022. In fact the dates of the 39th and the 40th session of working group V1 were brought forward to the 18th-22nd of October 2021 and to the 7th - 11th February 2022. If UNICTRAL approves the draft, there is the possibility that the text would then go to the UN General Assembly later on in 2022 year.

In view of all of this and as I have already stated in my letter to all NMLAs and in the report to the

Assembly only a few weeks ago, our focus now is on fine tuning the text. The IWG has worked hard in considering the annotated 4th revision by reviewing what remains in square brackets and we have produced.



CMI Meeting Notes for the 39th Session of UNCITRAL Working Group V1 Judicial Sales - Vienna 18th - 22nd October 2021. These notes have now become standard fare prior to each session and we are delighted to see that delegations consider them to be a very useful point of reference which assist in concentrating the attention of various delegations on the remaining outstanding issues.

It is crucial that these meeting notes are circulated to your State delegations attending the 39th session.

Thank you - all the National Maritime Law Associations who are participating in this historic project and to others who have been present throughout including the IMO and the EU Commission and NGO's making a very special and important contribution. These include BIMCO, ICS, IBA, IAJ, Law Asia, ITF, IMO, and IUMI who have offered much appreciated support. These have contributed significantly in assisting the CMI in its deliberations.

We now need that final push in this important project for CMI which captures the very entire raison d'être of the CMI and which continues to underline the important role which CMI needs to continue to play on the stage of international maritime law.

Finally I am sharing with you some pictures of our virtual meetings to give you an idea of what it has been like! Keep well and keep safe.

d) Report of the IWG of Unified Interpretation on the Test for Breaking the Shipowner's right to Limit Liability (1 November 2020 – 31 May 2021) -by Dieter Schwampe

Report of the IWG on Unified Interpretation on the Test for Breaking the Shipowner's Right to Limit Liability

The IWG consists of the following members: IWG Members: John Markianos-Daniolos (Greece, Co-Chair); Dieter Schwampe (Germany, Co-Chair); Eduardo Albors (Spain); David Baker (UK); Rafael Diaz-Oquendo (Venezuela); Vincent Foley; Luc Grellet (France); Kiran Khosla (UK); Darren Lehane (Ireland); Sabine Rittmeister (Germany)

The IWG supports the work of the Legal committee of IMO by drafting submissions, which were finally submitted as submissions of CMI setting out the purposes and intentions of limitation of liability, and the test for breaking such limitation, in various IMO conventions. CMI's submissions supported earlier submissions of Canada, Greece, Italy, Malta, Poland, the ICS and the IGP&I. Since LEWG 107, the matter is on the work program of the Legal Committee, which has instituted an informal Correspondence Group (CG). The CG had strong IMO member state participation by Australia, Japan, Canada, Malta, Cyprus, Netherlands, Finland, New Zealand, Georgia, Poland, Germany, Republic of Korea, Greece, Sweden, Italy and Thailand. Furthermore, the following industry associations were members of the CG: The International Chamber of Shipping (ICS), the International Group of P&I Associations (IGP&I), the International Union of Marine Insurance (IUMI), the International Association of Independent Tanker Owners (Intertanko) and the International Transport Workers' Federation (ITF).

The CG had issued a report, which had been submitted to the Legal Committee by the CG Member Georgia. The CG had developed the text of a draft Unified Interpretation on the test for breaking the shipowner's right to limit liability under the IMO conventions, which reads, inter alia:

that the test for breaking the right to limit liability as contained in article 4 of the 1976 LLMC Convention, article V(2) of the 1992 Civil Liability Convention and article 9 of the 2010 HNS Convention is to be interpreted:

- a. as virtually unbreakable in nature i.e., breakable only in very limited circumstances and based on the principle of un-breakability;*
- b. to mean a level of culpability analogous to wilful misconduct, namely:*
 - i. a level higher than the concept of gross negligence, since that concept was rejected by the 1976 International Conference on Limitation of Liability for Maritime Claims;*
 - ii. a level that would deprive the shipowner of the right to be indemnified under their marine insurance policy; and*
 - iii. a level that provides that the loss of entitlement to limit liability should begin where the level of culpability is such that insurability ends;*
- c. that the term "recklessly" is to be accompanied by "knowledge" that such pollution damage, damage or loss would probably result, and that the two terms establish a level of culpability that must be met in their combined totality and should not be considered in isolation of each other; and*
- d. that the conduct of parties other than the shipowner, for example the master, crew or servants of the shipowner, is irrelevant and should not be taken into account when seeking to establish whether the test has been met.*

The CG report was discussed in the Legal Committee in LEG 108 in July 2021. The discussions centred both on the substantive content of the draft report as well as the form in which the issue should be resolved. In the end, there was an agreed wording, as submitted by a Drafting Group and the agreed procedure (LEG 108/WP.8) that the resolutions should be made by resolutions of state members to the respective conventions during the next sessions of the IMO Assembly, which is scheduled for 6- 15 December 2021. As per the Provisional Agenda, the matter will be dealt with as agenda item 13 Consideration of the reports and recommendations of the Legal Committee. Annex 3 to the drafting group report, which deals with the 1976 LLMC, is shown hereafter. There are similar Annexes 3 and 4

to the report of the drafting group which deal with respective resolutions for the 1996 Protocol to LLMC and the 1992 CLC.

In parallel, in 2020 the IWG had prepared a questionnaire on practice in NMLA countries in respect of the test for breaking the shipowner's right to limit liability. Until today, the IWG received (only) 13 replies from the following MLAs:

- China
- Colombia
- Germany
- Greece
- Italy
- Mexico
- Norway
- Singapore
- Spain
- Switzerland
- Turkey
- United States
- Venezuela

The IWG would appreciate if other NMLAs could increase their efforts to provide answers to the questionnaire.

Hamburg, 26.09.2021
Dieter Schwampe, Co-Chair

LEG 108/WP.8
Annex 2, page 1

ANNEX 2

DRAFT RESOLUTION ON INTERPRETATION OF ARTICLE 4 OF THE CONVENTION ON LIMITATION OF LIABILITY FOR MARITIME CLAIMS, 1976

THE STATES PARTIES TO THE CONVENTION ON LIMITATION OF LIABILITY FOR MARITIME CLAIMS, 1976, PRESENT AT THE THIRTY-SECOND SESSION OF THE ASSEMBLY OF THE INTERNATIONAL MARITIME ORGANIZATION,

RECALLING that the International Maritime Organization has adopted a comprehensive limitation, liability and compensation regime that seeks to ensure that claimants receive prompt and adequate compensation, without the need for legal recourse, and that this regime represents a carefully negotiated compromise that balances the obligations and interests of governments, claimants and industry,

RECALLING ALSO that this regime encompasses the International Convention on Civil Liability for Oil Pollution Damage, 1992 (the 1992 Civil Liability Convention), the International Convention on Liability and Compensation for Damage in connection with the Carriage of Hazardous and Noxious Substances by Sea, 2010 (the 2010 HNS Convention), the International Convention on Civil Liability for Bunker Oil Pollution Damage, 2001 (the 2001 Bunkers Convention) and the Nairobi International Convention on the Removal of Wrecks, 2007 (the 2007 Nairobi Wreck Removal Convention) (together the Conventions),

RECALLING FURTHER that the Organization has adopted the Convention on Limitation of Liability for Maritime Claims, 1976 (the 1976 LLMC Convention), as amended by the Protocol of 1996 to Amend the

Convention on Limitation of Liability for Maritime Claims, 1976 (the 1996 LLMC Protocol), that provides that the shipowner may limit liability for certain specific claims as prescribed in article 2 of that Convention,

RECOGNIZING that the effective operation of the regime is dependent upon a uniform implementation and application that is consistent with the aims and objectives agreed at the time of their adoption, and that will ensure the Conventions are applied equally and equitably to all parties and claimants,

RECOGNIZING ALSO the need to provide legal certainty in the interpretation and application of the Conventions and to assist present and future States Parties to the Conventions, the 1976 LLMC Convention and the 1996 LLMC Protocol to apply them in a uniform manner,

CONSCIOUS that the purpose and objectives of the Conventions, to ensure that claimants receive prompt and adequate compensation, are achieved through the mechanisms establishing strict liability of the shipowner, the channelling of liability to the shipowner irrespective of fault and a requirement to maintain insurance or other financial security,

CONSCIOUS ALSO that the Conventions, the 1976 LLMC Convention and the 1996 LLMC Protocol are underpinned by the right of the shipowner, their insurer or provider of financial security, to limit their liability, and that the nature of such a right is inextricably linked to higher limits of liability and the insurability of such liabilities,

CONSCIOUS FURTHER that the 1992 Civil Liability Convention, the 2010 HNS Convention and the 1996 LLMC Protocol all provide for increases to these limits of liability in prescribed circumstances,

LEG 108/WP.8
Annex 2, page 2

NOTING that the right to limit liability is prescribed in article 1(1) of the 1976 LLMC Convention, article V(1) of the 1992 Civil Liability Convention and article 9(1) of the 2010 HNS Convention,

RECALLING the references to the right to limit liability under the 1976 LLMC Convention, as amended, in article 6 of the 2001 Bunkers Convention and article 10(2) of the 2007 Nairobi Wreck Removal Convention,

BEING AWARE that the 1976 LLMC Convention, the 1992 Civil Liability Convention and the 2010 HNS Convention provide that the shipowner shall not be entitled to limit its liability if it is proved that the pollution damage, damage or loss, resulted from his or her personal act or omission, committed with the intent to cause such pollution damage, damage or loss, or recklessly and with knowledge that such pollution damage, damage or loss would probably result (the test for breaking the right to limit liability),

BEING AWARE ALSO that the Conventions provide that, even if the shipowner is not entitled to limitation of liability, their insurer or provider of financial security may avail themselves of, or benefit from, the limits of liability prescribed therein,

RECOGNIZING that the test for breaking the right to limit liability was presented and adopted at the 1976 International Conference on the LLMC Convention as part of a package that was coupled with higher limits of liability (than the International Convention Relating to the Limitation of the Liability of Owners of Seagoing Ships, 1957),

CONSIDERING the difficulties which might arise from differing, and inconsistent, interpretations of the test for breaking the right to limit liability, and that without a Unified Interpretation of the test, eligible claimants may be deprived of prompt compensation,

CONCERNED that inconsistent application or interpretation of the test for breaking the right to limit liability that differs in scope from the intention could result in confusion and uncertainty and an unequal treatment of claimants,

ACKNOWLEDGING the importance of a Unified Interpretation of the test for breaking the right to limit liability to the long-term sustainability of the regime, and that the test can only operate and be effective if the States Parties affirm the meaning of the test in line with the principles which gave birth to it,

NOTING that the principles underpinning the test for breaking the right to limit liability are identified in the Travaux Préparatoires of the 1976 LLMC Convention,

DESIRING to reaffirm these principles by means of a Unified Interpretation,

UNDERSTANDING ALWAYS that the courts in States Parties are the final arbiters on the interpretation of the Conventions, the 1976 LLMC Convention and the 1996 LLMC Protocol, but that an affirmation of the test for breaking the right to limit liability in the form of a Unified Interpretation would assist courts, as well as governments, claimants, shipowners and insurers, in their interpretation and understanding of the test,

RECOGNIZING that, under the Vienna Convention on the Law of Treaties, 1969, "*A treaty shall be interpreted in good faith in accordance with the ordinary meaning to be given to the terms of the treaty in their context and in the light of its object and purpose.*" (Article 31(1)) and that "*Recourse may be had to supplementary means of interpretation, including the preparatory work of the treaty and the circumstances of its conclusion, in order to confirm the meaning resulting from the application of article 31 (...)*" (article 32),

LEG 108/WP.8
Annex 2, page 3

HAVING CONSIDERED the recommendations made by the Legal Committee at its 108th session:

1. AFFIRM that the test for breaking the right to limit liability as contained in article 4 of the 1976 LLMC Convention is to be interpreted:
 - a. as virtually unbreakable in nature i.e. breakable only in very limited circumstances and based on the principle of unbreakability;
 - b. to mean a level of culpability analogous to wilful misconduct, namely:
 - i. a level higher than the concept of gross negligence, since that concept was rejected by the 1976 International Conference on Limitation of Liability for Maritime Claims;
 - ii. a level that would deprive the shipowner of the right to be indemnified under their marine insurance policy; and
 - iii. a level that provides that the loss of entitlement to limit liability should begin where the level of culpability is such that insurability ends;
 - c. that the term "recklessly" is to be accompanied by "knowledge" that such pollution damage, damage or loss would probably result, and that the two terms establish a level of culpability that must be met in their combined totality and should not be considered in isolation of each other; and
 - d. that the conduct of parties other than the shipowner, for example the master, crew or servants of the shipowner, is irrelevant and should not be taken into account when seeking to establish whether the test has been met.
2. REQUEST the Secretary-General of the International Maritime Organization to circulate copies of the present resolution to all States which have signed, ratified or acceded to the 1976 LLMC Convention.

3. ALSO REQUEST the Secretary-General of the Organization to circulate copies of the present resolution to all Member States of the Organization.

I:\LEG\108\WP\LEG 108-WP.8.docx

3. NMLA Bulletin Board

a. Canada – by Paul Harquail

- Vanessa Rochester, Ph.D., a maritime lawyer with Norton Rose Fulbright Canada LLP in Montreal, Québec, who has also been a member, director, chair of two committees and Regional Vice-President of the CMLA for Québec, and also the President of WISTA-Canada, was appointed by the Minister of Justice of Canada as a justice of the Federal Court of Canada on August 6, 2021; and
- Gillian Grant, a long-time member, former director and former committee chair of the CMLA, and Alternate Permanent Representative of Canada to the International Maritime Organization (IMO), has been appointed Chair of IMO's Legal Committee for 2022. She will be the first woman and the second Canadian to hold that office. Her predecessor was Alfred Popp QC, who served as LEG Chair for many years with great distinction
- J Paul M Harquail was elected National CMLA President on June 7, 2021. A bilingual partner in the Saint John New Brunswick office of Stewart McKelvey- he is the first New Brunswicker to hold this office.

b. AIDIM – by Giorgio Berlingieri

The Italian MLA has been quite active in the course of 2021 and the following three Webinars were organized:

- The 12 March 2021 speakers reviewed the complex and fragmentary matter of seaside concessions, considering recent legislation and the connections with E.U. provisions.
- The 16 April 2021 various issues were discussed relating to the international instruments on collision of ships and a possible revision of the 1910 Convention.
- The 18 June a number of topics were addressed pertaining to maritime law in the post Brexit era, including jurisdiction clauses, coastal transportation and recognition of seafarers.

Another Webinar is to take place the 15 November 2021 on the 2007 Nairobi Convention on Wreck Removal and the 2009 Hong Kong Convention and the EU Regulation 1257/2013 on Ship Recycling.

Link to program

In fact the Italian Government is considering to ratify such Conventions. To that effect the Italian MLA is assisting the competent Ministries with advices and information and is also cooperating with them on the ratification of the LLMC and the Athens Conventions.

A (hopefully) *in-personam* Assembly is scheduled to take place the 22 October 2021, with the Agenda including the election of the Officers for the term 2021-2023.

The elections were to take place in 2020, however due to the impossibility to convene an *in-personam* Assembly, the Officers continued to act in a prorogation regime as allowed by Italian Law.

The Assembly is to be followed by a Seminar on jurisdiction in transportation and shipping matters. The relating provisions in the international Conventions and the E.U. provisions will be considered.

c. Croatia – by Igor Vio

- Croatian MLA has organized the 2nd International Maritime and Transport Law Course, which took place at the Inter-University Centre in Dubrovnik from September 6 to September 11, with lectures and presentations of many internationally renowned academicians and practitioners, including the Vice-President of the CMI Dr. Ann Fenech, who delivered a speech "Judicial Sale of Ships – Work in Progress" (complete programme and other relevant information available at the IUC website (<https://iuc.hr/programme/1511>)).
- Croatian MLA (which was founded in December 1991 after the disintegration of former Yugoslavia and dissolution of former Yugoslav Maritime Law Association) will celebrate its 30th anniversary during the Assembly that will take place at the University of Rijeka on 3 December 2021, and will organize a special colloquium covering recent developments of international and national maritime law, that will be available for online attendance.

4. Getting to know your EXCO – Profile Aurelio Fernandez-Concheso



Aurelio Fernandez-Concheso is a Venezuelan lawyer who obtained his law degree in the Andres Bello Catholic University in Caracas. He then obtained a Master of Laws in Admiralty with distinction from Tulane University in New Orleans, Louisiana being the 3rd Venezuelan to attend the program.

He went on to professional practice in Venezuela. He joined Clyde & Co in the opening its Venezuelan Office in 1991. He has been head of the Office since 1996.

He advocated for the creation of a specialized maritime jurisdiction and naval registry in Venezuela and after its creation in 2000, represented owners in the first trial before the Venezuelan Maritime Court. He also represented tanker owners in the first registration of a product tanker before the new naval registry.

He has been President of the Venezuelan Maritime Law Association and Secretary of the Iberoamerican Maritime Law Institute. He has been a professor of law at the Maritime University of the Caribbean in Caracas and lectured conferences in a number of Latin American universities and specialized venues. He has written 3 books on Maritime Law (Administrative Navigation Regime, Law on Aquatic Spaces and Venezuelan Maritime Procedure) and multiple articles and essays. He has represented and continues to represent owners, insurers, clubs, financiers and related corporate interests in multiple transactional and contentious matters of complex nature in that jurisdiction, Latin America, London, Paris, Hong Kong and New York.

5. Young Person's Essay Prize – by John Hare

I report to you on the adjudication of the 2020 submissions for the yCMI Essay Prize. After a lengthy process, the judges reached a consensus decision to recommend to EXCO that the winning entry for 2020 would be an essay on *Maritime Arbitration*. Although not essential that it should have been so, this topic remains on the CMI radar.

A few comments on the 2020 prize:

- As envisaged by the Rules (of which a copy is appended for convenience), the 2019 Assembly approved that we open the competition for 2020 to allow any maritime law topic. The Rules state however that preference may be given to essays that cover topics in the current CMI workbook, as evidenced by its website.
- The CMI Secretariat duly advertised the competition, via membership MLAs, educational institutions

and the industry. This is perhaps an area where we can fine-tune in the future.

- Again for this round we asked that candidates apply for an anonymous number to ensure impartiality. This was done successfully to the extent that none of us knew the identities of the candidates until after the adjudication process was completed.
- We had 10 submissions, and all complied broadly with the Rules.
- Scripts were submitted electronically to the judges. Again for 2020 I asked each judge to send their assessments only to me, so that none would at that stage see the opinions of the other two. Having cleared my proposal with the President, I duly approached Justice Sarah Derrington, and Professors Diego Chami (Argentina) and Paul Myburgh (Singapore).

I regarded myself as moderator rather than as a judge (so that I could oversee the process from a distance). However once again I did mark each essay, again before seeing the judges' assessments, so that I could make a reasoned and independent contribution.

- With the texts, I sent to the judges a template for their assessments. This allows a more meaningful comparison, as judges are all invited to look for the same things in each work. Not unsurprisingly, there was the sort of mark spread that one would expect from academics hailing from different countries and systems. But there was a commonality in the grades given.
- Collation of the marks was done by reducing the judges' percentages to a ranking out of the total of the 10 entries (and my own as a comparator). Those ranking numbers and the percentages from which they derive enabled me to compare the works by totalling up their rankings. Had there been a unanimous winner, he or she would thus have scored the lowest ranking of 3 (4 if my assessment were included). This, I suggest, is a fair way to seek consensus among the three judges who all award percentages at a differing scale.
- The rankings were then submitted to all three judges, who were unanimous in recommending the following results to EXCO:

Winner of the yCMI Essay Prize, 2020	
Dr Eva Litina, Greece enlitina@aegean.gr	<i>Maritime Arbitration, Dilemmas, Prospects and Challenges Lessons from contracts for the carriage of goods by sea</i>
Runners up	
Dr Arron Honniball cilhan@nus.edu.sg	<i>One Treaty to Apply Them All? The Impact of Cumulative Reservations on Defining Maritime Terrorism</i>
Alberto Bregante, Italy a.bregante@siccardibregante.it	<i>Ship-recycling: Evolution of the legal framework and future issues</i>

EXCO duly confirmed these results which are now submitted to the Assembly for recognition. All three authors have consented to the publication of their works on the CMI website. I should mention that at this stage it is only the winner who receives a prize. But the runners up certainly deserve recognition, as do all the entrants for a wide-ranging and well-prepared set of essays.

EXCO has invited me to convene the next yCMI Essay Prize – so that we can formally award 2020 and 2022 in Tokyo next year. Both winners can expect to travel to Tokyo as part of their prize, and to be given the opportunity to present edited versions of their papers to the conference. EXCO has accepted my suggestion that owing to the pandemic, we regard 2021 as a bye and that we call for entries toward the end of this year to stick to the time frame prescribed by the Prize Rules.

A topic for 2022?

The experiment of opening the competition to any topic on the subject of maritime and or marine law, taking guidance and even giving preference to the topics currently on the CMI work programme as evidenced on its website seemed to work satisfactorily for 2020. I would thus recommend to the Assembly that the topic for 2021 again be left open. We have had a proposal that we suggest (but do not prescribe) issues associated with providing a legal environment for a cleaner, better decarbonised shipping industry as a potential topic, and I would endorse that proposal which would be in line with the current focus on decarbonisation in the IMO.

6. 2021 Albert Lilar Prize– by Benoit Goemans

The Foundation Albert Lilar was constituted founded on 4th February 1977 by the family of the late Albert Lilar, who was a former Belgian President of the Comité Maritime International and a prominent maritime lawyer in Antwerp. The goal of the foundation is to encourage the study of maritime law both on a national and an international level and every three years the foundation awards a Prize to the author of a scientific work that was recently published and that is considered by the Board of Directors to have great merit and to serve the unification of maritime law or the development of comparative maritime law.



Image: Albert Lilar at his desk

You will find hereafter the message of the foundation inviting authors on maritime law to send their contribution.

The Albert Lilar Foundation will award in 2021 a prize of €2.500 to the author or authors of an outstanding publication which contributes to the unification of maritime law or to maritime comparative law.

The board of directors of the Foundation will act as jury.

The board will take into consideration publications

- written in French, Dutch, German or English;
- published after 14 October 2016 and before 15 October 2021;
- which have been sent in in three copies to the seat of the Foundation: Ellermanstraat 46, 2060 Antwerpen, Belgium, no later than 15 October 2021

The submitted books shall not be returned.

The object of the award is to encourage young talented authors.

The board shall not consider:

- articles and similar contributions;
- dissertations, and other study papers, unless commercially published.

The Board's choice is discretionary.

The Board may

- elect a publication of its own initiative even though not submitted;
- decide not to award the prize.

7. Obituaries

a) Javier Galiano – by Chris Davis

**COMITÉ MARITIME INTERNATIONAL
PRESIDENT**

9 April 2020

MLA Presidents
Titulary Members

Re: *Javier Galiano*

Dear All,

It is with profound regret and sadness that I have to pass on to you that another beloved member of the CMI family, Javier Galiano of Spain, passed away in Madrid on 5 April 2021. Mr. Galiano was a Titulary Member of the CMI and a founding partner of the Madrid law firm Albors, Galiano & Portales.

Attached is the 7 April 2021 letter prepared by Eduardo Albors, the President of the Spanish Maritime Law Association, outlining Mr. Galiano's outstanding skills as a maritime lawyer and arbitrator, his extraordinary qualities as a human being, and his contributions to international maritime law, the Spanish Maritime Law Association and the CMI.

Mr. Galiano received his law degree from the Universidad Complutense of Madrid in 1974 and, after qualifying as a lawyer, began his professional career as the Legal Director of Contenemar, a container shipping line based in Madrid. In 1985 he joined the law firm of Meana Green in Madrid, and in 1991 founded Albors, Galiano & Portales. He will be remembered by his colleagues and friends for his great negotiating skills, kindness, generosity, good humour and joie de vivre.

I am conveying my heartfelt condolences and those of the CMI to the Spanish Maritime Law Association, and asking them to be passed on to Mr. Galiano's family, including his beloved wife, Virginia, daughter Vir, and beautiful granddaughter.

Faithfully yours,
Christopher O. Davis

b) Tulio Alvarez Ledo – by José Alfredo Sabatino Pizzolante



Caracas, 24 September 2021

Mr. Christopher O. Davis
President
Comité Maritime International (CMI)

Re: Dr. Tulio Álvarez Ledo Ref: AVDM-00126-2021

Dear Mr. Davis,

It is with great sadness that we write this letter to inform the CMI and its Member Associations, of the passing of one of our former Presidents, and CMI Titulary Member, Dr. Tulio Álvarez Ledo, on 23 September 2021 in Caracas, Venezuela.

Dr. Álvarez Ledo, or Tulio as his friends and family called him, was born in La Guaira on 16 August 1938. He was a well known attorney, specialized in Maritime Law, who got his degree of Doctor at Law with the highest honors from Universidad Central de Venezuela (UCV). Tulio was also Licensed in Nautical Science from Escuela Náutica de Venezuela, where he obtained his degree as Captain, which ultimately placed him to be in command of various Venezuelan flagged ships, especially in the Compañía Anónima Venezolana de Navegación (CAVN). This allowed him to -successfully combine his studies in the maritime law, with his experience as a merchant marine commanding vessels.

He was an active professor in various courses, most notably: Legal Status of the Vessel, and Civil Cassation at UCV, but was also a titular professor in International Maritime Commerce at Universidad Marítima del Caribe from 1975 to 1995. Among hundreds of his articles in the academic field, his book "Derecho Marítimo" has been described as a "mandatory reference guideline" among his students, this speaks volumes of the high didactic quality that characterized Tulio.

Tulio was a member of the Judicial Committee, and a Magistrate in the Civil Chamber of the Supreme

Court of Justice (2000-2005). He was also the Vice President of the Committee in charge of amending the Venezuelan Maritime Legislation.

Titulary Member of the Comité Maritime International and a Founding Member of the Venezuelan Maritime Law Association, where he served as President, as well as Founding Member of the Instituto Iberoamericano de Derecho Marítimo.

Dr. Álvarez Ledo was a good member of this National Maritime Law Association, a great human being, colleague and friend. Tulio's passing is a great loss for the maritime community. He will be sorely missed.

Yours truly,
José Alfredo Sabatino Pizzolante
President

This will be the last News Letter for 2021 as Evelien will be on maternity leave from October for 4 months. Welcome to our newest CMI member, baby boy TARS.

The editors, Rosalie Balkin (left) and Evelien Peeters (right), wish all our readers a healthy COVID free New Year and everything of the best for 2022.



Copyright © 2021, CMI, All rights reserved.

*

Our mailing address is:
admin-antwerp@comitemaritime.org

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#)

This email was sent to <<Email Address>>
[why did I get this?](#) [unsubscribe from this list](#) [update subscription preferences](#)
Comite Maritime International · Ernest Van Dijckkaai 8 · Antwerp 2000 · Belgium



