

CESMA NEWS

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THE EUROPEAN UNION SHIPMASTER INFORMATION CHRONICLE

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REPORT ON 19TH CESMA ANNUAL GENERAL ASSEMBLY IN BARCELONA, CATALONIA, SPAIN

The 19th CESMA Annual General Assembly was organized in Barcelona, Spain, on 16th and 17th May 2014, at the invitation of the ACCMM, the Asociacion Catalana de Capitanes de la Marina Mercante.



NAUTICAL FACULTY OF BARCELONA

Prior to the Assembly, on 15th May, a seminar was organised by both the Nautical Faculty of Barcelona and the ACCMM, which asked attention for the advantages of simulators in the training of future navigation officers. It was organised at the premises of the Nautical Faculty of Barcelona, a division of the Polytechnical University of Catalonia, which houses in a beautiful building, a former ducal palace.

There were presentations by Dr. Marcella Castella, lecturer at the Polytechnical University of Catalonia on simulation-based model courses to demonstrate seafarer's competence. She pleaded

to include navigation simulator sessions in refresher courses as mentioned in the 2010 Manila amendments to the STCW 1978 convention of the IMO.

Mr Cees Muyskens of the Maritime Institute Willem Barentsz (Terschelling, the Netherlands) elaborated on the theme "Navigation Simulators, present and future". In this context, IMO initiated an International Simulator Working Group in order to organize and structure simulator related matters for inclusion in the STCW revision.

Mr. Boran-Keshishyan, Head of Navigation Department of the Maritime State Academy of Novorossiysk (Russia) gave an overview of the present curriculum of the maritime education in Russia which comprises 5 years including 12 months of on board and simulator training.

Capt. Bill Kavanagh, CESMA councilmember of the Irish Institute of Master Mariners and lecturer in Nautical Science at the National Maritime College of Ireland in Cork, represented CESMA, by elaborating on "Design of bridge navigation simulation exercises for effective training and education". Capt. Kavanagh also pleaded for yearly refresher simulator sessions for every navigation officer, including masters. These sessions should be COLREG orientated.

The afternoon was dedicated to an "open table" discussion which was moderated by Captain Mariano Badell, President of the host association ACCMM. The theme was simulator time as replacement for actual sea time to obtain a STCW certificate for watch keeping officer. After some lengthy and fruitful discussions, the meeting came to the following conclusions:

1. 12 months is actually already too little to serve as head of the navigational watch.
2. more simulator training courses are advocated as useful.
3. however not as replacement of actual sea time which is already considered minimal.

The next day, the CESMA Council meeting took place at the board meeting room of the Barcelona Port Authority (WTC). 14 associations from 11 EU nations had delegated representatives to Barcelona. Internal and husbandry issues are being discussed in these closed meetings. Important discussion was the intention to nominate a fourth member of the board as activities and expansion of the Confederation mean too much work for only three board members, especially for the General Secretary. It is proposed to nominate a vice president as is also mandatory according to the Statutes. Previously this stipulation was ignored due to economic restraints as travel expenditure for board members is born by the confederation. Relating to this, it is proposed to slightly raise subscription rates. This is the first raise in subscription in 8 years. The proposal is accepted unanimously by the council members present.



CESMA COUNCIL IN BARCELONA

Next the General Secretary presented the financial papers for the year 2013. The year was the most active in the existence of CESMA (see CESMA logbook 2013) which resulted in a relatively small infringement of the reserves. Yet the financial situation of CESMA is sound and the accounts and the budget for 2014 are approved by the Council.

On membership, the board was glad to announce the new membership of the Portuguese Shipmasters' association SINCOMAR, in 1995 one of the supporters of the initiation of CESMA. There are negotiations with associations from Poland, Greece, Estonia and Turkey.

A proposal of KBZ (Belgium) to base the organisation also on shore based masters and calculate subscription accordingly, was not found feasible with regard to the ultimate aim to preserve CESMA only for active seagoing masters, which is also stipulated in the Statutes. Individual membership is slightly decreasing. There are only 4 individual members left.

View relations with other maritime organisations, it is decided to look for good relationship with f.i. the Nautical Institute and IFSMA. Especially the NGO status of IFSMA with the IMO is seen as very important. Mutual invitations for Annual General Assemblies will be considered to exchange ideas and information. Also the participation in the European Nautical Platform will be continued.

The Annual General Assembly was held on 17th May in the conference hall of the Maritime Museum of Barcelona. Apart from the 14 CESMA council members, many members from the ACCMM and other interested parties were present.

After initial presentations of sponsors, covering such issues as the outlay of the ports surrounding



Barcelona (Ports de la Generalitat), expected changes in the use of fuel by ships as a consequence of the new IMO regulations on emissions (REPSOL) and the MLC implementation in Spain, Mr. Pieter Verbakel (Netherlands Customs) presented a paper on the EU initiated ANNA project, which looks at simplifying documentation between ships and ports and reducing paperwork on board.

Next the Annual General Assembly started. Discussions covered a wide area of maritime related issues such as the criminalisation of seafarers, shipmasters in particular. A number of recent cases were discussed and it was found that CESMA advocates urgently for masters to obtain an proper insurance against relevant occurrences which always come unexpected. Piracy was also discussed and it was noted that the imminent danger now came from West in stead of East African waters. The resolution on the use of military or private armed guard teams on board merchant vessels was maintained. The condition that the master should not be held liable for any action of the teams, was cancelled, as so far, no relevant case has occurred.

The Assembly again discussed the problem of fatigue in the shipping industry. The requirement of a minimum of three certified bridge watch keepers, including the master, on each seagoing vessel of 500 GT and more, is still supported by CESMA. The introduction of MLC could have a positive influence on the condition that lists, showing work/rest periods, are correctly completed at all times.

On maritime safety, last year's resolution on safety of ro-ro and passenger ships as well as car carriers was maintained. Apart from some adaptations by the IMO, after the accident with the "Costa Concordia", nothing much has changed. Another concern is the safety of large container ships which are liable to structural damage.

The assembly emphasized again that seafarers should not rely exclusively on GNSS systems as they are vulnerable to disturbances. A debate concluded that astro navigation is no longer a reliable back up as many ships nowadays do not carry a sextant anymore. In stead, e-Loran is considered a good possibility if administrations can be convinced to re-install and modernize the already forgotten system. However astro should be maintained to determine compass errors.

The Assembly discussed the necessity of a proper marine spatial planning (MSP), at present topical in the North Sea area, where the building of windmill parks and other permanent structures are threatening to hamper a proper flow of shipping traffic. Members are urged to give attention to the questionnaire on the CESMA website, asking for opinions on safe manoeuvring distances in lanes reserved for shipping. CESMA takes part in the EU project ACCSEAS, also covering this issue.

The General Secretary continues to attend the SAGMAS meetings. SAGMAS stands for Stakeholders Advisory Group on Maritime Security in which stakeholders can express their views on the work of the EU Regulatory Security Committee (MARSEC). Outcome of the meetings is considered confidential although advices on maritime security from CESMA member associations are welcome. Another issue on the agenda was cyber security in the maritime industry.

Recently reports have shown that communication and navigation systems on board ships, provided by satellite techniques, can easily be disturbed and influenced by hackers. For example AIS signals can be disturbed and even phantom vessels can be created. CESMA participates in the NIS platform initiated by DG CONNECT of the European Commission. WG2 covers amongst others the issues of incident reporting. The Assembly agreed on the participation in the NIS Platform and awaits results.

The employment for EU seafarers on, preferably, vessels under an EU flag, was an important issue in the discussions. CESMA will do its utmost to convince EU ship owners of the quality of the many candidates who are presently following maritime education and training institutes in Europe. Contacts with maritime universities in Europe is seen as very important also with regard to finding places for cadets on EU flagged vessels in order to complete their education and training and obtain the necessary certificates. The issue of finding capable, English speaking, mentors is seen as crucial, especially on vessels with a multi-national crew.

The General Secretary reports on the activities of the European Nautical Platform which shares knowledge and best practice as well as accident/incident reporting in the field of nautical operation in the area between pilot station and berth. The ENP will present a joint paper during the coming European Maritime Day in Bremen. The European Maritime Safety Agency has shown interest in the activities of the Platform.



**Capt. Mariano
Badell Serra**

The Assembly again shortly discussed the efficiency of life saving equipment on board seagoing vessels including incidents and accidents during drills. It has noticed that little has been changed on existing vessels. It again urges the IMO and flag states to introduce proper legislation to improve safety and design of life saving equipment in order to avoid fatal accidents.

CESMA expresses its appreciation for all the work and efforts which have been performed by the Asociacion Catalana de Capitanes de la Marina Mercante to make this CESMA General Assembly a huge success. Our personal thanks go especially to Captain Mariano Badell who was the "engine" behind this very successful assembly. (F.J.van Wijnen)



HACKING ON THE HIGH SEAS

In our internet age, more and more devices are hooked up online, so they become vulnerable to attack. As international industries, like the maritime and energy, connect ships, containers and rigs by using satellite techniques to connect to computer networks, they expose weaknesses that hackers can exploit. Hackers recently shut down a floating oil rig by tilting it, while another rig was so riddled with computer malware that it took 19 days to make it seaworthy again. Somali pirates choose their targets by viewing navigational data online, prompting ships to either turn off their navigational devices or fake the data so it looked that they were somewhere else. Moreover hackers infiltrated computers connected to the Belgian port of Antwerp, located specific containers, made off with their smuggled drugs and deleted the records.

Data on the extent of the maritime industry's exposure are still hard to come by. There are few reports that hackers have compromised maritime cyber security. Researchers however say that they have discovered significant holes in the three key technologies that seafarers use to navigate: GPS, AIS (Automatic Identification System) and ECDIS (Electronic Chart Display and Information System).

Increasingly the maritime industry has turned to technology to improve safety and reduce costs. These technological changes have opened the door to emerging threats and vulnerabilities as equipment has become accessible to outside entities. As crews are getting smaller and ships become bigger, seafarers increasingly rely on automation and remote monitoring, meaning key components, including navigational systems, can be hacked. And normally there are no cyber security professionals on board.

To avoid attacks and remain undetected, ships often switch off their AIS system when passing through waters where Somali pirates are known to be operating or fake data to make it seem they are somewhere else. Shipping companies generally play down the potential threat from hackers. They admit that they are concerned about the possible access by pirates to valuable information. Some said that they have established appropriate countermeasures to handle the threat and maintain that vessels are not more vulnerable to attacks than on shore systems and organisations.

A study last year performed in six ports in the USA found that only one had conducted an assessment on how vulnerable it was to a cyber attack and no one had developed any plan to respond to such an attacks. Of the 20 largest container carriers it was found that 16 had serious security gaps. So far however there is little evidence that in the maritime industry systems have been breached compared to other sectors.



Mrs Nelie Smit Kroes
Commissioner DG Connect

Yet the industry is massively in need of assistance. The main ship navigation systems of today such as GPS, AIS and ECDIS are standards, supported by bodies such as the IMO which made them mandatory on larger commercial and passenger vessels. Researchers have demonstrated that it was possible to change a ship's course by faking a GPS signal to dupe its on board navigation system. It was shown that an attacker with a cheap VHF radio could exploit weaknesses in the AIS system which transmits data such as a vessel's identity, type, position, heading and speed to shore stations and other ships. It could hamper with the data, impersonate port authority's communication with a ship or effectively shut down that the communication between ships and ports.

A British research firm found flaws in an ECDIS software that would allow an attacker to access and modify files including charts. These vulnerabilities could cause accidents resulting in serious environmental and economic damage. Incorrect electronic digital charts are already mentioned as causes of recent accidents. International authorities, such as NATO, have already warned for the dangers of exclusive reliance upon electronic systems, particularly if they are found to be vulnerable to cyber attacks. Most of these technologies were developed when bandwidth was very expensive and the internet did not exist.

CESMA was made aware of the dangers of cyber insecurity and its influence on maritime safety and security at SAGMAS meetings of the European Commission. It subsequently became involved in the NIS platform, initiated by DG CONNECT, which deals with cyber security in a European context. As a stakeholder, CESMA is part of working group 2 of the project which mainly deals with incident reporting. As cases as before mentioned have not gained much interest in the recent past, signs are that the problem of cyber security is now getting the attention it really deserves.



MULTINATIONAL VERSUS ONE NATIONALITY CREW

challenges of present manning

The last few decades marked enormous changes in the shipping industry. It is usually defined as mature, cyclical and capital intensive. With the fast development of shipping technology and specialization of ships, these basic characteristics of the shipping industry became more and more evident. Ship owners started squeezing the expenses and all that led to changes in the basics of the industry.

During the 20th century, most of the time, crews on board ships sailing in the merchant marine had consisted of one nationality or at least a few nationalities close to one another. The main ship owners came from the economically developed countries as well as the crews. In the last quarter of the 20th century a lot of modern specialized ships appeared in the market. The number of ships and consequently the need for crew members increased, especially with the development of the oil and gas industry and containerization. The last decade of the 20th century was marked with the collapse of the Soviet system and opening of former centrally planned economies to international trade. Ship owners began to look for reducing crewing costs which led to the employment of multinational crews and crews from developing countries. The process of loading and unloading became more and more intensified. Traditional general cargo ship stayed in port for a week under operation while modern container ships stay in port only a few hours and in the oil industry we see ships loading and unloading miles from shore and going ashore during the contract is almost impossible.

Some countries, mainly from the Far East, such as the Philippines and ex-soviet bloc countries, turned into labor supplying countries. Important ship owners and ship operators began supporting education and training facilities in such states. The consequences of those changes are in several directions. Employing cheaper crews gave ship owners and ship operators economic advantages as they reduced direct expenses.

On the other hand, the maritime profession in developed countries became less attractive and so less qualified people started coming into the industry. The spiral continued and the final effect to the maritime industry is that less qualified personnel are serving on board ships. And then the STCW95 convention came, which is a kind of definition of minimum standards. As a consequence all parties in the industry began to seek these minimum standard to minimize expenses.



Enormous changes took place in maritime technology. Celestial navigation, visual navigation and pure seamanship almost disappeared. Now we have GPS systems, electronic charts and all other modern equipment without which nowadays seafarers cannot survive. Being pilot from experience, I see that really in some situations seafarers are indeed surviving. Regardless of all modern means of navigation and all modern ships, the intensity of work is becoming more and more. People on board ships have instructions for all activities they should perform when on board, when and how to wake up, when and how to eat, rest, etc. But in most of the time they even have no time to read these instructions. Of course, we could give a lot more examples of the changes but above mentioned are enough to emphasize that the environment on board modern ships has changed.

Are crews ready to meet the challenges of the modern maritime industry? Let's start with one nationality crew and most probably old times. The most important benefit on board of one nationality crew, is the absence of the language problem. The probability of misunderstanding and even misinterpretation is almost zero. Normally people understand each other and, they have more or less similar behavior. In good old times, when work on board was eight hours or less and there were no computers, videos and DVD players, films were shown in communal areas and there were other means of entertainment. Crew members lived more socially on board, That created a more socially friendly environment on board ships. What is going on today?



a multi-national crew

We now have multinational crews on board most of the merchant marine ships. It is not unusual to have more than two, sometimes even five or six nationalities, different religions and different cultures on board. Sometimes we have apparently incompatible crew members on board one ship. The solution of the problems created, can be found in the ISM Code and the strict definition of duties of each crew member. From the average ship owners' point of view, the situation is acceptable when they have legal proof of the obligations of everybody on board and they do not care how each crewmember will fulfill his own duty on board. Everybody on board is used to withdraw himself during his off duty time. During discussions with my colleagues, still acting as masters, chief engineers and officers on board, they use to join the ships with a number of films and books and communicate with the other crew members only officially. During rest periods, they shut their door and watch films alone. Social elements in relationships among crew members almost

disappeared. If everything is normal, it works. The problems come in contingency situations when everyone should improvise and do as much as possible. The "obligations culture", when everyone is doing only his own duties and does not care about the others and the entire situation, is reducing the efficiency of the system. And that is the negative side of the present organization. But the employment of multinational crews reduces the expenses of the ship owners and thus they could survive in the present economic situation.

To summarize, we have from one side ship owners who try to reduce labor costs. There are ship owners employing national crew on at least management level. But the vast majority of ships is registered under a flag of convenience or in a second national registry and the entire crew is mostly from labor supplying countries – Eastern Europeans and former Soviet countries, Turkey, and Far East countries. The management level crew is predominantly from developed countries and the operational level crew is from poorer and developing countries. If there are crew members from one nationality on board the ship, there is still some possibility for social communication. Otherwise everyone is doing for himself. From a psychological point of view, it is possible to work in that manner but the effects of reducing contacts are evident because as human beings, one needs social communication and if the limit is exceeded then man becomes less effective and sometimes dangerous either in normal or especially in extraordinary situations.

What could be done to turn off the negative effect of the above mentioned problem? There should be stimulus for unofficial and none obligatory communication between the crew members. In that direction are the amendments of the maritime labor legislation and adoption of the MLC Convention. More social welfare will persuade crews to gather again in the mess room in their rest time, to watch films together, to play some games, etc. So the stress and workload on board could be reduced.

Nostalgia for old times will not help us. We live in our modern world. Shipping is becoming more international and the future lies in the use of multinational crew members. Shipping companies, together with international organizations, non-governmental organizations and all other participants in the process of carriage of goods at sea, should join their efforts to mitigate the negative effect of alienation and demotivation. A step in that direction are the mandatory training courses in Bridge/Engine Team Management and Bridge/Engine Resource Management, as required by the IMO. But in the package of all the training required, a lot of seafarers just pass the courses and do not pay attention afterwards. And the training is for the greater part purely psychological and if one wants to benefit from it, he or she should be convinced of the usefulness of the training.



Captain Dimitar Dimitrov

In our modern world there are still very religious people on board ships and they need their time and respect to dedicate themselves to their religion. I remember two MAERSK container ships with Myanmar crew. They had the symbols of their Buddha religion on the bridge and they used to put every morning some food and some coca cola near the Buddha statue. When I asked them how often they are doing that, the captain confirmed that every morning the same procedure is performed. Practically the resource is not so big and if it motivates the crew, there is nothing wrong with it. At the same time that action could be entirely strange for other crew

members having different religion or being atheists. The tolerance of the last will well help improving the atmosphere on board.

We should keep our good experience and we should advise youngsters from all nationalities and religions about traditional values on board ships. On modern iron ships they are even more necessary in certain situations, than on board good old wooden ships.

It seems that the role of the religion is decreasing in developed countries, while it is still quite influential in the developing countries. With the decrease of the role of the religion, the traditional human values gradually disappear and if nothing comes in their place than people become more and more closed to themselves. Additionally the financially oriented culture is dominating our modern society. Each action is connected with the possibility to gain more money. Money making is good stimulus but it is not always a motivating stimulus. Let's consider a case of emergency. Sometimes one should forget his own interest in favor of the common interest of all the crew and even in favor of the interest of all the parties in the surrounding environment.

In our Bulgarian history we have a very positive case. Bulgarian steam ship "Kniagina Maria Luisa", ex French steam ship "Felix Fressinier", 5075 tons, 2400 horse power engine, built 1919 in Port de Bouc, France, was alongside in the Port of Piraeus, Greece on May 30th, 1941 loaded with aviation bombs and barrels full of gasoline. A fire broke out during unloading and spread out quickly. Bulgarian shipmaster Ivan Kostov Tomov, born 1897 and graduated from the maritime school in Bulgaria and naval academy in Germany, together with 9 of the crew, decided to take the vessel out of the port. Shortly after leaving the berth, the bombs on board exploded and the ship sank. The captain died together with five more crew, saving the Port of Piraeus. He did not make beforehand any extra insurance and he did not think about his remuneration. He simply made what was right taking the risk for few crew members thus saving many more citizens ashore. How many shipmasters today will do the same? The question is open.

(by Captain Dimitar Dimitrov)



EUROPEAN MARITIME DAY 2014 IN BREMEN



On 19th and 20th May CESMA attended the European Maritime days in Bremen, Germany. These occasions which are usually divided in an official part with the presence of DG MARE and local and other dignitaries. This is followed by a series of workshops on actual topics in the European maritime industry. Although the main accent is concentrated on environmental issues and fisheries, there is always occasion for other subjects to be presented, although it is difficult to obtain a time slot as there are many parties who want to present their products or activities, also from a commercial point of view.

This year we participated together with our partners in the European Nautical Platform in a workshop dedicated to maritime education and training coordinated by the Gdynia Maritime University in Poland. We were fortunate to find Dr. Jens Froese, Professor of Maritime Logistics at the Jacobs University in Bremen, available to present a paper on the "Image of the Seafarer", a subject close to our hearts. Professor Froese began with mentioning several other organizations such as ISF, BIMCO and ITF which have already carried out studies on the same subject. There is a worldwide shortage of capable seafarers and something has to be done about it. One way out is the improvement of the image of the seafarer which seems to be at a all-time low.

Professor Froese mentioned a number of examples in which the seafarer is presented to the public, such as in Germany, where the TV series "Mein Traumschiff" draws a large audience. This showcase image of a shipmaster changed suddenly when the accident with the "Costa Concordia" occurred. Captain Schettino was almost immediately pictured in the press as a coward, a fool and a criminal. Images of the disaster went all over the world, discrediting seafarers, masters in particular.



Prof. Jens Froese

Which are the realities? Being a seafarer was long time connected with visiting exotic foreign countries, meeting nice girls (in every port one) and wearing flashy uniforms. Today's seafarer is more an administrator which has make long working hours to be able to cope with piles of paperwork and numerous laws and conventions. Activities while on board are influenced by sometimes adverse conditions, lack of qualified staff, dangers of attacks by pirates and unwanted guests in the form of stowaways.

What could be improved? Salaries and contract conditions have already greatly improved, causing ship owners and operators to look for seafarers from every corner of the world as long as they are cheaper and less demanding. Deprivation could be compensated by shorter contracts and better communication with family and friends by way of internet available for everyone on board. Accommodation on board could be improved also by noise reduction to enable crewmembers to have more profit of their rest periods.

Improving the image of the seafaring profession in an effort to attract well educated and capable young people, also from EU countries, to the maritime industry is not an easy task. The emphasis in recent years was too much directed at recruiting seafarers from third world countries. Various studies, a.o. from SIRC in Cardiff (UK) have shown that living conditions and accommodation have deteriorated in the last years, not adapting to developments in western nations. Changing the tide will not come easy. (Capt. F.J.van Wijnen)



WEIGHTY MATTERS

As the IMO held its latest maritime safety committee meeting, it seems wholly appropriate in this World Cup year that progress is being made on Goal based ship construction standards. However, perhaps the biggest development at the meeting last month was the adoption of the SOLAS amendment regarding mandatory weighing of gross mass of containers before loading onto ships, and new guidelines regarding the verified gross mass of a container carrying cargo.

Shippers are now required to submit the verified gross weight of containers before loading onto ships. Without such accompanying document, relevant export containers shall not be loaded onto ships. The amendment and its guidelines will be effective July 1, 2016, after due adoption by MSC 94th session in November 2014. Why so late?

A number of organizations have been quick to applaud this most common sense of decisions – not least because wrong-declared or incorrectly declared container weights are one of the major causes of accidents in container shipping, road transportation and terminal operation. It has seemed ludicrous that container weights were the subject of best guesses, or fantasy. Indeed there was only ever going to be one effective solution to this problem and that was to mandate that container weight verification occur at the point of origin.

Now is the small matter of translating the rule change into reality. The International Association of Ports and Harbours (IAPH) wholly supports the change, but has voiced concern about how each global jurisdiction will no doubt impose different approaches to weight verification. According to IAPH, in the interests of port operators, they are calling for weight verification to be completed before a container enters the port precinct. Indeed, they believe that without weighing at the very earliest opportunity then the not weighed containers will continue to allow a significant risk to road users within the port and to terminal operators (stevedores) if they have to handle a container with unverified weight. They add that expecting a terminal operator to verify the weight as part of its handling process, is not a complete solution and the IAPH will be encouraging regulators within governments or port jurisdictions to seek solutions which verify container weights as close to the point of packing side as is practical. Thankfully now we can at least be certain of the weight if not the actual nature of the contents... (from Shiptalk)



EUROPE AND EU SHIPPING A TWO-WAY STREET

On the eve of its Board of Directors meeting, the European Community Shipowners Association (ECSA), organised a high-level seminar to discuss the economic value of the EU shipping industry, as outlined in the Oxford Economics, study commissioned by ECSA. CESMA was invited and represented by Captains Jef Cuyt (Councilmember) and Fredrik van Wijnen (General Secretary)

Mr Philippe De Backer, Member of European Parliament from the ALDE Group gave the opportunity to ECSA Board members to meet with several MEP's and discuss the findings of the study that clearly indicate the vital importance of EU shipping as a source of revenue and jobs in the EU. Mr De Backer said: "The study offers a good indication of the value of EU shipping for our economy. It provides an excellent overview, with specific numbers, giving us MEP's extra arguments to take into account when drafting shipping-related legislation". The discussions continued at a panel debate that allowed participants to analyse in greater detail the findings of the study and deliver some key messages to Commission Vice-President Mr. Siim Kallas and other Commission officials who attended the seminar.



Commenting on the need for a global level playing field, Philippe Louis Dreyfus, President of Louis Dreyfus Armateurs, said "Competition yes, but for everyone and everywhere" and added: "the EU should help EU industries to fight against third country protectionism".

Mr. Philippe L. Dreyfuss

Mr. Niels Smedegaard, CEO of DFDS, referred to the adoption of the SECA sulphur emissions limits will force companies to close financially struggling shipping routes and shift cargo back to the roads, which will be detrimental to the EU's own CO2 emissions' reduction targets. "We are willing to participate in the reduction of our emissions but we need good coordination between industry and legislators and a fast-track EU-wide support for retrofitting our ships", concluded Mr Smedegaard.

Mr. David Dingle, CEO of Carnival UK, gave a vote of confidence to EU seafarers: "We strongly believe in the skills of UK and EU seafarers. [...] They are highly prized assets and ship owners, as well as the EU economy, rely on them" he said. He continued by pointing out that EU seafarers are sought after by ship owners, and that there is therefore no need to "shackle" ship owners with EU legislation that only leads to more bureaucracy and therefore ends up being counter-productive.



Mr. David Dingle

Commission Vice-President Mr. Siim Kallas stated that it would be to the benefit of the EU and ship owners alike to find a global solution for the reduction of CO2 emissions, as was the case with the IMO Energy Efficiency Index (EEDI) and asked ship owners to do everything that is in their power to increase fuel efficiency. "We want EU shipping to prosper so that it can serve a flexible and dynamic European economy" he concluded.



Thomas Rehder

Wrapping up the seminar Mr. Thomas Rehder, ECSA President, said "The results of the Oxford Economics study highlight what we in the industry have been preaching for years: EU shipping is important for Europe and the EU stands to profit considerably by fostering its shipping industry. We have built a relationship of trust and I hope that, through honest dialogue and efficient cooperation, it continues to be a reciprocal process. After all, the link between Europe and EU shipping is a two-way street".

Source: European Community Shipowners' Associations (ECSA)

CESMA was handed a copy of the Oxford Economics Study



DAY OF THE SEAFARER 2014

Remembering those seafarers being attacked and kidnapped by pirates. Approximately 500,000 seafarers annually sail in seas where pirates operate and are in danger of being attacked.



As the world celebrates the Day of the Seafarer 2014 and pays tribute to their dedication and contribution to global trade, the Maritime Piracy Humanitarian Response Programme (MPHRP) and its partners also remember the 38 seafarers and fishermen still held hostage by Somali pirates and those that are increasingly being attacked in the Gulf of Guinea, the Straits of Malacca and elsewhere. MPHRP chair Peter Swift said "Following the successful release earlier this month of 11 seafarers from the MV Albedo after 1288 days in captivity and

the joyous reunions with their families, we remember today those that are still held hostage in Somalia, all of whom have been held for more than two years – some for over four years, and the terrible ordeal and hardship that they and their families back home are suffering." He continued "we encourage all stakeholders to do everything possible in their power to secure their prompt release and to support and assist them and their families." MPHRP Acting Programme Director Hennie la Grange said "While piracy in the Indian Ocean is contained, it is not eradicated. Pirates retain the capability to operate in the region and will no doubt resume activities if the industry's guidance on best management practice is not diligently applied and naval forces were to be withdrawn." Commenting on the attacks in West Africa and the South China Seas, La Grange said: "In 2013 almost 2000 seafarers were attacked at sea. All seafarers and families affected by piracy should have access to support services to help them cope and recover. The MPHRP's partners are committed to helping the growing number of seafarers and families who have been affected or are threatened by piracy."

PRIMARY TASKS FOR A SHIPMASTER



What are the primary tasks involved in the job?

First: The Captain is responsible for the safety of the ship and everyone on board.

Second: I'm in charge of the Bridge team, for the safe navigation of the ship, and manoeuvring entering and leaving port.

Third: I also represent the company publicly - on board I'm hosting receptions and meeting and talking with our guests.

Fourth: The Captain needs to motivate and encourage the ship's company to deliver Cunard's famed White Star Service to our guests.

Captain Chris Wells on board "Queen Victoria"

TO COMPLY OR NOT TO COMPLY

Northern European regulators will face a battle with many shipping companies over new EU rules aimed at cutting pollution from ship fuels as some owners are likely to find it cheaper to pay fines than to comply. The EU Sulphur Directive is set to come into force within six months, on 1 January 2015. The new sulphur requirements impose that ships sailing in the SECA's (Sulphur Emission Control Areas (North and Baltic Sea and English Channel) use bunker fuels with a sulphur content of maximum 0,1% or that the same level of emissions is reached by the use of alternate fuels or compliant abatement technologies.

Ships are typically powered by heavy fuel oil or bunker oil, both of which produce harmful pollutants such as sulphur dioxide which can cause respiratory and heart problems. Such fuels contain 2.5 to 3 percent sulphur on average, which is up to 3.000 times the sulphur content in their emissions of road fuel in Europe, according to marine campaigners Seas at Risk. Ship owners can comply by



changing fuels, such as to low-sulphur marine gasoil, which can cost four times as much as high-sulphur bunker fuel. Or they can use bunker fuel and fit a “scrubber”, a technology that filters out pollutant gases before they are released into the atmosphere. This costs as much as 3 million euros (\$4 million) for a small vessel – often more than the value of the ship itself – and as much as 12 million euro's for a larger ship, and it could take up to two years for every ship to be fitted.

Scrubbers have been identified as one of the few abatement technologies available, allowing ships to reduce the sulphur content in their emissions. However, a lack of clarity in EU rules jeopardises their uptake. Firstly, EU Member State legislation differs when it comes when it comes to discharges of water used by filtering the ship's exhaust gases. Due to a lack of accurate information on the compositions of these discharges, there is high

uncertainty on whether the operation of some scrubbers will be allowed in close proximity to the shore. This uncertainty jeopardises investments already made by operators or gives reason to others to cancel orders.

Another option is to use liquefied natural gas (LNG), but ships would need expensive retrofitting, and there is not yet a reliable supply chain in place for LNG. “Neither of these options (scrubbers and LNG) can easily be deployed by January 2015. Many shipping firms have complained about the costs of meeting the regulation, saying it will damage competitiveness and lead to job losses.

All ships worldwide, however, will be subject to a limit of 0.5 percent sulphur content in fuels by 2020 under rules by the International Maritime Organization, although this regulation is still subject to a feasibility review.

Despite many efforts to by the European shipping world to delay the introduction of the new sulphur regulation in EU waters, in order to have more time to adapt, it appears that the deadline of 1 January 2015 is final. Which will be the consequences? Shipping companies have already reacted by closing some services and the possible raising of tariffs. Both measures could easily result in bringing transport back to the European roads, something which the European Parliament and Commission is trying to prevent by creating “motorways of the seas”. Logic is sometimes difficult to discover.

Another branch which is threatened by higher cost, is the cruise industry. The cruise vessels which are trading in North European waters and the Baltic Sea will see their fuel costs rise when they have to switch over to gas oil when entering North European waters. It makes calling at these ports less attractive and tickets will become more expensive. Who are suffering? All those businesses in European ports which are benefitting from the calls of the cruise vessels. A number of cruise vessels has in the meantime adapted by installing scrubber technology.

What can be seen as problematic is compliance with the new regulation and the methods to control every ship which enters the SECA area. Who will control ships whether fuel consumption will be switched over from heavy fuel to gas oil and although it will be mandatory to measure emissions and keep record, verifying will appear to be very difficult.



“RICA” (TRANSFENNICA)
(scrubbers already built in)

The same goes for ships with inbuilt scrubbers. When will the scrubbers be operational and where do we deposit the water used by the scrubbers which will undoubtedly contain sulphur residue? While some countries allow these water discharges close to their shore, others don't, while in some other districts strict conditionality applies. Thus clarifications are urgently

needed regarding the EU Water Framework Directive which foresees a progressive reduction for some pollutants and a complete phasing out of others. As a result, there is currently very high uncertainty on whether the operation of scrubbers will be allowed in close proximity to the shore in European Union nations. This current uncertainty jeopardises investments already made by operators in Europe. It also hampers the commission of future installations while time is running out with 1 January 2015 approaching fast.

The most important question from the side of shipmasters is the blame culture which undoubtedly will appear when the regulation comes into force. Ships which do not comply will be prosecuted and who will carry the can? We have seen many shipmasters being accused of marine pollution, especially near the French where overzealous judges seem to make overtime. In this regard the level of the fines for not complying is crucial. Some operators will undoubtedly try to instruct masters to evade the regulations. What will come next?

We will also see ships switching over from heavy fuel to gas oil on the last (economical) moment when entering the English Channel where shipping traffic is dense. A black out as a consequence of the switching over is not unimaginable. Anyone who has been to see long enough, knows about these dangers and consequences in handling a vessel during a black out in waters with dense traffic.

All in all, legislators in the European Union can expect a lot of negative consequences if they pursue their intentions. With it, they take a lot of responsibility which can easily affect maritime safety and provide shipmasters with responsibilities which they can hardly control.

Based on information by ECSA



THE RISK OF DELIBERATE ATTACKS ON TANKERS

On 9th April CESMA was invited to take part in a senior stakeholder workshop in Brussels initiated by RAND Europe and two other partners, on the consequences of a deliberate attack on different types of liquefied gas, oil and chemical tankers. The study was commissioned by DG MOVE of the European Commission. The vulnerability of tankers during an attack by pirates was raised by CESMA during security meetings in Brussels, especially with regard to using fire arms as a safeguard to counter pirate attacks.



The workshop was attended by representatives from 12 countries from various backgrounds including security firms, national transport authorities and administrations, trade associations including ECSA and CESMA (represented by Captain J. Cuyt) and the European Commission.

Awareness of the potential for deliberate attacks on tankers has increased due to several examples of incidents in recent decades. Tankers have been successfully targeted by pirates, terrorists or other radical groups. Especially the increase in piracy in recent years demonstrated the need to improve security measures for maritime tankers. Moreover the need for proactive security measures is further emphasized by the potential of deliberate attacks by terrorists. This type of attack would likely aim at large-scale damage and casualties. It could also have long-lasting economic, environmental, legal, political and social consequences.

To be able to deliver the study objectives, the project team has investigated motivations, methods and outcomes of deliberate maritime attacks through data collection, analysis and validation. Research was conducted through desk-based reviews of past attacks and event scenarios to be expected. Additional collection was undertaken through a series of informant interviews with expert stakeholders in the maritime industry. This evidence base was combined with the operational and subject matter expertise of the project team. The interim findings identify the key vulnerabilities, threats and consequences of potential deliberate attacks.

Tankers may present an attractive target, both for pirates and terrorists, and have inherent vulnerabilities. Due to standardised design of tankers, sometimes low freeboards and slower speed, common vulnerabilities exist across different tanker types. The distinction between safety and security considerations is not always clearly defined. While the structure of modern tankers conforms with strict safety standards, it may not always be invulnerable to security threats. Such vulnerabilities are also exacerbated in certain situations, such as when a tanker is isolated, in restricted waters or connected to a facility, loading or discharging. In addition tanker crews and port workers may also present vulnerabilities that can be exploited in a deliberate attack.

The understanding of vulnerabilities of tankers is strongly attached to the awareness of potential threats. Past historical events show that attacks onto maritime objects are both conceivable and attractive from a terrorist perspective. The nature of threats will vary, depending on factors such as the location of the vessel, kind of attack, weaponry used and intended outcome.

The study also addressed potential consequences of deliberate attacks on tankers. Consequences will be both immediate and on longer term. Immediate consequences, occurring early in the attack will depend on methods used by the attackers. They may include structural damage, casualties and localised impact. Secondary consequences, which last beyond the immediate crisis period of

response, are likely to be persistent and multilateral. External variables help to determine the severity of these longer term consequences in the economic, environmental, political, legal and social domain. Secondary consequences are strongly interconnected and will vary in their particular patterns depending on the characteristics and context of a specific attack scenario.



"Limburg" after attack

In conclusion, it was clear that the study mainly addresses the threats emanating from terrorist activities. The piracy aspect was hardly discussed. Apart from a few cases, such as the attack on the tanker "Limburg" in 2002 and on "USS Cole", in which 17 US service men and women were killed, terrorist attacks are rather exceptional, although some hypothetical situations reviewed in this study could give the impression of a "James Bond" scenario. Still, we are convinced that this study will help not only the

European Commission but also ship owners and crews to enhance the awareness of the risk of terrorist threats and activities anytime, anywhere. Be prepared for the unexpected and remember 9/11 and better be prepared.

Abbreviated and adapted from an article by Capt. J. Cuyt (KBZ) in "Nautilus" May 2014



OPINIONS

My apologies for my absence at the AGA 2014 of CESMA in Barcelona due to health conditions. I would have liked to expose participants that the Maritime Labour Convention of 2006 does not bring any solution to cancel the six on / six off watch system. This system allows vessels to be only manned with a captain and one officer. My theory is to cancel the stipulation that the daily rest period of 10 hours can be divided into two parts, one of which must be at least a period of six uninterrupted hours. Currently legislators look more to economic incentives than to maritime safety and security. After announcing the rules to implement the MLC, the legislator candidly expressed that "each member acknowledges that the guideline in terms of normal hours of work of the seafarers as well as other workers shall be based on a eight-hour working day".

Considering this, it would be suitable to introduce a law similar to legislation issued by the Spanish state for Spanish flag vessels to candidate states before entering into the EU:

"workers cannot perform in one day a total more than twelve hours, including, when applicable, overtime, both if the vessel is in port or at sea. Between the end of the working day and the beginning of the following, employees shall be entitled to a minimum of an eight hour break. This rest is twelve hours when the vessel is in port, considering to be the time that staff remains ashore or on board of their own free will, except in case of the necessary presence during loading or unloading operations, work for security or maintenance of the vessel. In organising the watches at sea, it should be stipulated that they do not exceed four hours and that the period between two sea watches should be eight hours. I am aware that this stipulation is expensive and will never be accepted by ship owners. Yet relevant activities by the IMO are necessary as they will improve maritime safety. (THIS IS MY DREAM).

Captain Jordi Juan-Torres
Former Secretary ACCMM (Barcelona)
Honorary Member of CESMA

RESOLUTIONS ARISING FROM THE CESMA GENERAL ASSEMBLY ON 17 MAY 2014 AT THE MARITIME MUSEUM IN BARCELONA, SPAIN.

Resolution nr. 1: Criminalisation of seafarers.

The 19th Annual General Assembly in Barcelona, Spain, again noted that the problem of criminalisation of seafarers and of shipmasters in particular, continues to be a matter of great concern. Co-operation between all parties in the maritime industry is the best solution to tackle the problem of criminalisation. CESMA urgently requests ship owners and/or operators to always provide legal protection to masters, serving on their ships, in case of an incident as a consequence of which they are detained by local authorities, until, at least, a verdict has been pronounced. Moreover masters are urgently advised to take a risk insurance, such as the "Master Mariner Protect", into consideration.

Resolution nr. 2: Piracy

The Assembly again discussed the problem of piracy against ships in various parts of the world with the attacks on ships in the West Africa area now becoming more frequent and violent. Although CESMA is still critical about the use of fire-arms on board, as it could escalate violence, it maintains its position, as agreed during last year's AGA in Nantes, that it does not oppose, as a temporary measure, the employment of officially certified armed guard teams on board, either military or private, respecting the respective legislation in the various EU member states. It will adopt a practical position in line with European and international organisations on the condition that the authority of the master is efficaciously maintained, even when fire-arms have to be used. CESMA also insists on exact rules of engagement to be observed under all circumstances and internationally respected diplomatic protection of masters against liability at all times.

Resolution nr. 3: Fatigue and safe manning.

The Assembly again discussed the problem of fatigue in the shipping industry. The requirement of a minimum of three certified bridge watch keepers, including the master, on each seagoing vessel of 500 GT and more, is still supported by CESMA. It still denounces the flexibility clause in the stipulation of hours and rest in the STCW convention, enabling the system of the six on six off watch schedule to be continued, as it affects maritime safety and the health of the seafarers concerned. The introduction of the MLC could have a positive influence on the condition that lists, showing work and rest periods, are correctly completed at all times.

Resolution no. 4: Safety of roro- and large passenger ships.

The Assembly also discussed the safety of roro- and large passenger ships as well as car carriers also with regard to the latest accident in Korea. Disembarking a great number of passengers and crew in an emergency situation continues to be a concern, view damage stability and availability of sufficient and efficient lifesaving equipment.

Resolution nr. 5: Safety of life saving equipment.

The Assembly again shortly discussed the efficiency of life saving equipment on board seagoing vessels including incidents and accidents during drills. It has noticed that little has been changed on existing vessels. It again urges the IMO and flag states to introduce proper legislation to improve safety and design of life saving equipment in order to avoid fatal accidents.

Resolution nr. 6: Employment of EU seafarers

Considering the shortage of employment opportunities for young European officers on board EU-flag vessels, CESMA appeals to EU ship owners to create opportunities for young EU officers to start their careers on board EU flagged vessels on operational level and allow them to obtain managerial level. Also for cadets to create berths on board enabling them to complete their practical education and training and to obtain their certificates. In this way maritime knowledge and experience within the EU merchant fleet and maritime industry can be maintained. All efforts should be employed to interest European young people to choose for a maritime career.

Resolution nr. 7: Cyber security in the maritime industry

The Assembly discussed the possibilities of cyber insecurity with regard to ship management. Communication and navigation equipment such as AIS and GPS, are vulnerable to intrusion by hackers. CESMA supports and is involved in EU initiatives to find solutions to eradicate this danger.

Resolution nr.8: Marine Spatial Planning in EU waters

The Assembly discussed the necessity of a proper marine spatial planning (MSP), at present topical in the North Sea area, where building of windmill parks and other permanent structures are hampering a proper flow of shipping traffic. Members are urged to give attention to the questionnaire, initiated by NVKK, on the CESMA website, asking for opinions on safe manoeuvring distances in lanes reserved for shipping. CESMA takes part in the EU project ACCSEAS, also covering this issue.

(Barcelona 17th May 2014)



NEWS FROM LITHUANIA



This week we celebrated the 80th Sea Festival since 1934. At the occasion the renovated and consecrated symbol of Klaipeda, the "Meridianes" raised her sails and was symbolically handed over to the people of Klaipeda. The ceremony drew attention from public figures, businessmen and seafarers, anticipating that this occasion will entertain seafaring Klaipedians and city guest for a long time to come. Just a few years ago, the "Meridianes" was not more than

a wreck. Thanks to contributions from several businessmen, the ship was renovated and returned to its "home" in Klaipeda. At the ceremony captains Sigitas Sileris and Zenonas Kaupas, both former cadets on board the former training vessel, 55 years ago, thanked the entire team that contributed to the revival of the "Meridianes" and said that the ship will always remind them of their first experience at sea. Both are members of the Lithuanian Seacaptains Association. The "Meridianes" will function as a museum and will accommodate expositions.



CESMA LOGBOOK (2014 – 2)

We were represented at the following occasions:

02 Apr Brussels	ECSA seminar
14 Apr Rotterdam	Meeting EMRF
14 Apr Grosseto	Court case "Costa Concordia"
29 Apr Brussels	Meeting ANNA project
15 May Barcelona	Seminar on simulation.
16 May Barcelona	CESMA Council meeting
17 May Barcelona	CESMA Annual General Assembly
19 May Bremen	European Maritime Day
05 June Sandefjord	IFSMA Annual General Assembly
06 June Sandefjord	IFSMA Annual General Assembly
11 June Rotterdam	Seminar on social dumping of seafarers
27 June Brussels	SAGMAS meeting



On the front page:

- The schooner "Santa Eulalia", the place for the welcome reception during the 19th CESMA AGA in Barcelona
- The "Costa Concordia" on her last voyage to Genoa
- Mr. Matteo Renzi, Italian Prime Minister and former mayor of Florence, who will be in charge of Europe when Italy presides the European Union for the next six months.

FROM THE EDITOR

- According to British experts and the US Coastguard, LORAN stations should not be abandoned. This ancient technology of radio navigation based on transmissions by earth based antenna's is now subject to a programme of modernization. The aim is to act as a back up for eventual errors of existing satellite navigation systems such as GPS, Glonass and in a later stage Galileo. France has been asked to maintain and improve its LORAN stations covering the English Channel and the Atlantic Ocean.
- British firm of e-learning material, Videotel, has introduced a training programme on how to engage and work with armed guards on board. The programme is primarily targeted at Company Security Officers (CSO's) and also at Masters and senior officers.
- The European port state control organisation (Paris MoU) has confirmed on 17th June that Lloyd's Register (LR) was the highest performing Recognized Organisation (RO) in the European port state control area for the rolling three year period (2011-2013).
- On 19th June the French Parliament has definitely accepted, with an unanimous vote, a proposition of law which authorises private armed security teams on board French flagged vessels in areas infested by piracy.
- The process against Captain Schettino of the "Costa Concordia" has continued from 30th June until 4th July in the Tuscan city of Grosseto. During the process the opinion about safety devices and lifeboats on board will be discussed among experts. Recently a relevant survey was held on board the stricken vessel, still near Giglio, in the presence of Captain Schettino who served as a witness at the request of the judge.
- Portugal's second shipping register, the International Shipping Register of Madeira (MAR) is currently the strongest-growing flag in Europe. In the last six months, MAR's fleet increased by more than 60 vessels representing a net growth of 130% in terms of tonnage. Among the new entrants to the new register are vessels owned by more than 20 of Germany's leading shipping companies, looking for a more "convenient" flag than the German flag.
- Chalmers University in Sweden is one of the participants in an EU project under the 7th Framework Programme which deals with the realization of autonomous and unmanned vessels by developing and verifying a concept for an autonomous ship without crew. MUNIN is the abbreviation for Maritime Unmanned Navigation through Intelligence in Networks.
- The disaster with the "Costa Concordia", after the cruiseliner capsized near Giglio Island in Italy now more than two years ago, will likely end up costing the ship owner just over 1.5 billion euro including the ship to be broken up for scrap and the cost of repairing the damage to the Island of Giglio.
- Mr. John M. Lyras, Chairman of the London P&I Club, has recently called for renewed concerted international action on the provision of places of refuge for ships involved in casualties. Nearly two years after the disaster with the tanker "Prestige", we still receive reports of other shipping casualties where efforts to mitigate pollution or other risks, have been hampered by a reluctance to provide the ships involved with a place of refuge.
- Two ministries in Ireland have announced the ratification of the Maritime Labour Convention (MLC) by Ireland. From 21st July, 2015, Ireland will be a party to the Convention and will implement the requirements contained therein, both for Irish-flagged ships and for international ships calling at Irish ports.
- The EU Foreign Affairs Council has recently extended the mandate of the EU mission on regional maritime capacity building in the Horn of Africa until 12 December 2016. This mission forms part of the EU's approach in fighting piracy in the Horn of Africa.





AIMS OF THE ORGANISATION (abridged)

- TO WORLDWIDE PROTECT THE PROFESSIONAL INTERESTS AND STATUS OF EUROPEAN SEAGOING SHIPMASTERS.
- TO PROMOTE MARITIME SAFETY AND PROTECT THE MARINE ENVIRONMENT.
- TO PROMOTE ESTABLISHMENT OF EFFECTIVE RULES WHICH PROVIDE HIGH PROFESSIONAL MARITIME STANDARDS AND PROPER MANNING SCALES FOR VESSELS UNDER AN EUROPEAN NATION FLAG.
- TO INFORM THE PUBLIC IN THE EU ABOUT PROBLEMS IN THE EUROPEAN MARITIME INDUSTRY AND THOSE CONCERNING SHIPMASTERS IN PARTICULAR.
- TO CO-OPERATE WITH OTHER INTERNATIONAL MARITIME ORGANISATIONS.
- TO RETAIN AND DEVELOP THE HIGHEST MARITIME KNOWLEDGE AND EXPERIENCE IN EUROPE
- TO BE INVOLVED IN RESEARCH CONCERNING MARITIME MATTERS IF APPLICABLE IN CO-OPERATION WITH OTHER EUROPEAN INSTITUTIONS AND/OR ORGANISATIONS.
- TO ASSIST MEMBER SHIPMASTERS WHO ENCOUNTER DIFFICULTIES IN PORTS WITHIN THE REACH OF NATIONS REPRESENTED BY CESMA MEMBER ASSOCIATIONS

ANNUAL SUBSCRIPTION:

EURO 14,- (EXCL EURO 5,- ENTR. FEE)
PER SEAGOING MASTER
(WITH A MINIMUM OF 25)
FOR FULL MEMBER ASSOCIATIONS
EURO 7,- PER SEAGOING MASTER
(WITH A MINIMUM OF 25)
FOR ASSOCIATED MEMBER ASSOC.)

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