

ISPS and CREW WELFARE**Captain Rakish Suppiah ***

In November 2001, International Maritime Organization's (IMO) Maritime Safety Committee and its Maritime Security Working Group started its year long intense work for the review of the resolution A.924 (22) on measures and procedures to prevent acts of terrorism which threaten the security of passenger, crews and the safety of ships. The Conference of Contracting Governments to the International Convention for the Safety of Life at Sea, 1974 (SOLAS) which was convened in London from 9th to 13th December 2002 have gave birth to resolutions namely the International Ship and Port Facility Security Code (ISPC CODE) which was adopted on the 12th of December 2002 and resolution to amend chapters V and XI of SOLAS by which compliance with the Code became mandatory as of 1st July, 2004. Chapter XI was later amended to XI-1 and XI-2 to adopt the special measures to enhance maritime security.

The Code's objective was to establish an international framework involving co-operation between Contracting Governments, Government agencies, local administrations and the shipping and port industries to detect, assess security threats and take preventive measures against security incidents affecting ships or port facilities used in international trade. The Code requires the designation of appropriate officers or personnel onboard each ship as the ship security officer, in each port facility and in each shipping company to prepare and to put into effect the security plans that will be approved for each ship and port facility.

THE HUMAN ELEMENT

Seafaring is a profession and they are just like many other ordinary workers in any work force. They should enjoy the same right as accorded to workers ashore. Those rights should include the right to life, right to payment of wages, right to healthy, safe and decent working conditions. People working ashore have variety of access to medical services if they fall sick because the hospitals and clinics are at their disposal twenty four hours a day. Seafarer have to depend on ship's first aid kit, thus it is really important for seafarer's to be allowed ashore to visit clinics or other medical facilities while at port.

Due to the nature of ship operations, seafarer's often work 14 to 16 hours a day. Contrary to standards set in the International Maritime Labour Organization's Convention on Seafarer's Hours of Work and the Manning of Ships Convention 1996, conditions such as excessive working hours still exist. Even after staying and working onboard for weeks and sometimes months especially for large tankers discharging in Single Buoy Mooring (SBM), the seafarer's still do not enjoy the freedom of going on shore leave. Article 3.19 of the Convention on the facilitation of Maritime Traffic 1965 stated that;

“Foreign crew members shall be allowed ashore by the public authorities while the ship on which they arrive is in port, provided that the formalities on arrival of the ship have been fulfilled and the public authorities have no reason to refuse permission to some shore for reasons of public health, public safety or public order.”

Even Alexander Justice, in his commentary on Article XX of the Code of Oleron explained:

“The reason for article XX was to keep the seaman in health and vigour. For by encouraging them to go ashore, two at a time, when their attendance was not necessary onboard, the Master gave them an opportunity to refresh themselves on

land, which is the best remedy in the world for the Scurvy, contracted a ship board by living on salt meats and dry biscuits and being crowded up in close place for a considerable time. Their eating fresh provisions and breathing the free air at land makes 'em strong and better able to go thro' their business".

MARITIME LABOUR CONVENTION

They are urgent need for the revision of the Safe Manning Certificate to take into consideration of the workload of this seafarer's. This issue was highlighted in resolution 3 of the SOLAS Conference in December 2002, in particular part 1(e), requesting for a review of Resolution A.890 (21) "Principles of Safe Manning" in light of the new security related responsibilities. With the advent of the ISPS Code, the International Confederation of Free Trade Unions (ICFTU), the industry, labour supplying countries and the World Maritime Trade Union have expressed concerns on fatigue and under-manning issues and through a document ICFTU had submitted to the Maritime Safety Committee (MSC) , asking for the review of the principles on safe manning.

Article IV of the Maritime Labour Convention 2006ⁱ, which is still yet to be adopted mention the need for those standards as the seafarer's employment and social rights. Standard A1.4 (Recruitment and placement) elaborates on the importance of public seafarer recruitment and placement services to provide services in an orderly manner that protects and promotes seafarer's employment rights as provided in that Convention.

Regulation 2.1 (Seafarer's employment agreements) emphasized the importance of contracts indicating that it should be clearly written and legally enforceable and shall be consistent with the standards in the Code. The regulation also allows the seafarer to review and seek advice on the terms and conditions in the agreements and to sign without any undue influence. Regulation 2.7 (Manning Levels) suggest that seafarer's to work on board ships with have sufficient personnel for the safe and efficient operation of the ship. Consideration is made towards continuous safe operation, high level of security on board taking into account concerns on seafarer's fatigue and the particular nature and conditions of the voyage. When determining, approving or revising manning levels, the competent authority shall take into account the need to avoid or minimize excessive hours of work to ensure sufficient rest and to limit fatigue.

Article 111 of the Convention on Fundamental Rights and Principles, engrossed the provisions of its law and regulations with respect the fundamental rights of:

- a) freedom of association and the effective recognition of the right to collective bargaining;
- b) the elimination of all forms of forced or compulsory labour;
- c) the effective abolition of child labour; and
- d) the elimination of discrimination in respect of employment and occupation.

And in observing (b) and (d) above, we can assume that without ergonomically designing or amending the ISPS code (implementation criteria) we would not be able to comply with those rights and principles. The ship personnel are basically being forced into contributing for compliance of the Code without prior studies being carried out on the aspect of fatigue and stress. Without considering those amendments to the safe manning standard onboard, the level of uncertainty on the application of the Code onboard would be imminent. It is no doubt to note that the ISPS Code works ergonomically in an attempt to regulate the behavior of seafarers and port authorities through elaborate regulatory procedures as preventive measures in relation to combating criminal offences that pose a threat to maritime security.

THE CODE

Looking at macro-ergonomics that combine the organizational and social environment where the human-machine functions, it could be observed that it adopts a top-down approach where it requires the participation from all levels for the success in the implementation of the Code. But when we look at the top of the 'pyramid' which comprises the entities like the Maritime Safety Committee and the Maritime Security Group that developed the Code, we can see that there is a failure in their obligation to identify the seafarer's role onboard. Seafarers are the actual implementation tool for the Code. If IMO did design the Code according to the sociotechnical system where human-machine interrelation is being considered, then who shall we consider to implement article 7 of Part A of the Code which is Ship Security? The article requires at security level 1, through appropriate measures, all ships take preventive measures against security incidents asⁱⁱ:

- a) ensuring the performance of all ship security duties;
- b) controlling access to the ship;
- c) controlling the embarkation of persons and their efforts;
- d) monitoring of deck areas and areas surrounding the ship;
- e) supervising the handling of cargo and ship's stores; and
- f) ensuring that security communication is readily available.

In addition, the Ship Security Officer is also required to carry out the security assessment of the ship on-scene which includes the following elements:

- a) identification of existing security measures, procedures and operation
- b) identification and evaluation of key shipboard operations that it is important to protect
- c) identification of possible threats to the key shipboard operations and the likelihood of the occurrence, in order to establish and prioritize security measures; and
- d) identification of weakness, including human factors, in the infrastructure, policies and procedures.

And the security assessment shall be documented, reviewed, accepted and retained by the Company. Those are the required preventive measures that should be identified in the security plan and manual. The Ship Security Officer as per article 12 includes duties and responsibilities not limited to:

- a) undertaking regular security inspections of the ship to ensure that appropriate security measures are maintained;
- b) maintaining and supervising the implementation of the ship security plan, including any amendments to the plan
- c) coordinating the security aspects of the handling of cargo and ship's stores with other shipboard personnel and with the relevant port facility security officers;
- d) proposing modifications to the ship security plan;
- e) reporting to the company security any deficiencies and non-conformities identified internal audits, periodic reviews, security inspections and verifications of compliance and implementing any corrective actions;
- f) enhancing security awareness and vigilance on board;
- g) ensuring that adequate training has been provided to shipboard personnel, as appropriate;
- h) reporting all security incidents;
- i) coordinating implementation of ship security plan with the company security officer and the relevant port facility security officer; and
- j) ensuring that security equipment is properly operated, tested, calibrated and maintained, if any.

It is a tremendous effort for a single person or a ship with reduced manning to cope with all the responsibility and duties stated above. Consideration of the proposed duties and responsibilities should be adequately distributed among the competent and security trained ship personnel with consideration of the stipulated working hours. Security duties onboard ship should be dedicated

only to trained ship personnel whom are specially trained in implementing maritime security on ships, so that the duties and responsibility could be implemented with success.

It is made mandatory in Chapter V of SOLAS, regulation 14 that the contracting government to the convention shall undertake for its national ships to maintain, or, if it necessary to adopt measures for the purpose of ensuring that, from the point of view of safety of life at sea, all ships shall be sufficiently and efficiently manned, with reference to Resolution A.890 (21) Principle of Safe Manning as amended by resolution A.955(23). The chapter refers to only the Safety of Navigation, but article 4.28ⁱⁱⁱ of Part B of the Code request administrations to take into account any additional workload which may result from the implementation of the ISPS Code and ensure that the ship is sufficiently and effectively manned.

ISPS AND SHORE LEAVE

In 2005, the International Transport Federation carried out a survey sending out questionnaires to about 230 seafarers' union affiliates representing approximately 700,000 members and to 127 ITF inspectors to gauge the effectiveness of the Code and the implication of its implementation to seafarers. Vast majority of the reply from the seafarers said they were adversely affected by the implementation, either by the excessive workload or denial access to shore.

Eighty-six per cent maintained that the ISPS Code had resulted in extra work with an adverse impact on crew performance and well-being, whilst only 4% reported an increase in manning levels to cope with the additional work load. In the context of human rights abuses, of primary concern is the issue of shore leave and the restrictions placed on seafarers wanting to leave a vessel.^{iv} Fifty eight percent of the reported cases of shore leave denial were in US ports. The Associated Marine Officers and Seamen's Union of the Philippines (AMOSUP) carried out its own survey and result depicts the amount of seventy percent of shore leave denial in US ports.

Being confined to living in ships with small numbers of crews of different cultural background does limit their communication progress and further when there is limitation of communication to the loved ones at home, it creates mental and physical illness. In a report submitted by a ITF officer (Stefan Mueller Dombois) in Long Beach, USA, the following were recorded:^v

“In December 2005 the *M.V. Sunny Globe* arrived in Long Beach to off-load cement and take on scrap metal, a task that would take about seven days. On 14 December an immigration officer came on board the vessel to question the seafarers. One of those questioned was a Filipino Ordinary Seaman (OS) who had not long been at sea. When asked about his previous career he replied that he had been a mechanic. This prompted a follow-up question on the uses of brake and engine oil – the official seemed set on testing the seafarer's technical knowledge. The OS was shy and had limited English language skills. He could not answer the question. The Master of the vessel offered to vouch for his crew member, saying that he had sailed on two previous contracts with him and confirming that he was of reliable character. The reference was not deemed acceptable. Instead the immigration officer issued a 'notice to detain the alien on board', requiring that the seafarer be 'detained on board under safe guard at all time while in the US'. His stated reason for the detention was given as 'malafide'. The rest of the crew were allowed ashore.”

Security restrictions and a feeling of being neither trusted nor valued are undermining seafarers' faith in themselves. The morale of those who work at sea has reached an all-time low and the effect on recruitment is plain to see. Many believe our high-value industry needs a serious makeover if it is to attract the high-value recruits it deserves. Anyone who has been to sea can tell you that there is no worse place to be if you are feeling down or depressed. On-board suicides are

at an all-time high; morale is at an all time low. What is sapping seafarers' morale and what is the effect on recruitment?^{vi}

Washington's ratification of the International Labour Organization convention on a standard biometric seafarer identification card remains mired in uncertainty, and visa requirements for non-US seafarers will continue to scupper shore leave on a large scale in the near future.^{vii} Australia has raised its interest to issue visa for foreign crews landing in any of its ports^{viii}. What has happen to all the freedom of the sea?. ILO's convention on seaman's I.D. bring to light the international application of human right to seafarer where the issuance would be based on a timely background search being carried out of each seafarer before issuance of the I.D. With its universal application, this system would ease the process of visa application at every port of call.

Seafarers have human rights, too. There is a lot to be said for putting yourself in the other person's shoes. How would you feel? This is a question that needs to be asked more often of officials guilty of a slavish adherence to regulation, unleavened by common sense. How would you feel, for instance, if you were master of a containership calling into Singapore and wished the agent to make an appointment for you to visit the doctor, only to be told that because you were a Pakistani citizen and did not have a visa this medical attention would be withheld as you would not be permitted to leave the ship?^{ix}

In a case in the United States Supreme Court in 1943^x, it was decided that:

“The assumption is hardly sound that the normal uses and purposes of shore leave are exclusively personal and have no relation to the vessel's business. Men cannot live for long cooped up aboard ship without substantial impairment of their efficiency, if not also serious danger to discipline. Relaxation beyond the confines of the ship is necessary if the work is to go on, more so that it may move smoothly. No master would take a crew to sea if he could not grant shore leave, and no crew would be taken if it could never obtain it. Even more for the seaman than for the landman, therefore, the superfluous is the necessary... to make life livable and to get work done. In short, shore leave is an elemental necessity in the sailing of ships, a part of the business as old as the art, not merely a personal diversion.”

SEAFARER'S I.D.

On June 20th, 2003, at the United States initiative, the International Labour Organization adopted the Seafarer's Identity Documents Convention (Revised ILO-85). This convention enhances maritime security by setting international standards for a seafarer identification documents (SID) that provides reliable, positively verifiable and internationally acceptable identification. This convention at one juncture allows or gives the right to shore leave and would require member states to accept SID as a document replacing visa. This would require the member state to maintain an electronic database containing all the information of their own seafarers to be accessible by authorities from all ILO member states.

The SID will act as a waiver for the need of visa- D ½ but the cost of implementation and maintaining of the database would be upon the member states. Seafarer's would not receive any incentives to obtain the SID unless specified by their particular state. Because of the standard being set for the approval of the SID is high which indeed satisfy the technical requirements of the U.S. enhanced border security and visa reform entry act 2002 which is machine readable, tamper proof, digital photograph, biometric, it sure do cost high for the processing and obtaining of this Card. On the other hand, the SID offer the best possible solution between legitimate port security requirements and the need for crews to attend to their physical, emotional, and spiritual needs on shore leave, provided that the convention is broadly ratified and implemented.

However, there is still uncertainty about the reliability and safety of biometric procedures, and the use of biometric “smart-cards” can provoke certain misapprehensions concerning user privacy. Some critics say that biometric technology is far from foolproof and that while it can improve security in some situations, it cost more frequently far outweigh its benefits. Critics assert that a widespread system of biometric seafarer IDs would not necessarily unmask terrorist who have managed to obtain and carry them^{xi}

Even the most advanced systems falsely reject a small proportion of legitimate users and falsely accept illegitimate users. There are also issues relating to the issuance of cards to the wrong person. The ILO places great emphasis on requiring flag administration to maintain a proper database available for international consultation by authorized officials and to observe adequate procedures for the issuance of identity documents. Although the new proposed standard is based on the principle of holding cost as low as possible, some ILO members have quoted concerns that such sophisticated identity documents would cost more than the existing seafarers’ cards.

THE IMPACT TO THE SOCIETY AS A WHOLE

When ships are intending to enter a foreign port they may be required to provide information to the port state including:

- International Ship Security Certificate
- ship security level
- security level at last ten ports
- special or additional security measures at the last ten ports

In essence, it is the responsibility of the crew to protect the perimeter of the ship from unauthorized access and the responsibility of the port facility to protect that area of the port which interfaces with the ship. There are some anticipated problems with initiating the new procedures. For example, a VLCC trading between the Middle East and the Louisiana offshore oil platform has a 45 day turnaround. The master would have just joined two or three months ago and he would not be in a position to accumulate this information unless proper documentation is being kept, but then with new system being implemented this would be a very difficult task. The rules require the ship to have proof of security status at her last ten ports. As enforcement commences in the US the Coastguard will have to be aware that this ship will take over a year to accumulate the ten security declarations. Another problematic area at the outset will be the approved status of foreign ports. Assessments will have to be made concerning hundreds of ports worldwide. This cannot be done overnight. The Coastguard will therefore have to exercise some flexibility, at least initially. This sought of complication has rendered many Master’s to drop down the hat and look for a shore job or just retire.

PORT STATE CONTROLS

If there are clear grounds for believing that a ship is not in compliance with the ISPS Code, the Port State Control officers should attempt to establish communications with the ship and its administration in order to rectify the situation. Should this fail, they may take proportionate steps that include:

One requirement is that the ship proceed to a location specified in a country's territorial seas, or internal waters. For example on 10th September, 2002, US coastguard personnel were conducting a routine examination of the container ship *Palermo Senator* when their radiation detectors were activated. A security zone was immediately established around the vessel, which had recently arrived in Port Elizabeth, New Jersey from Valencia, Spain. The vessel was escorted to anchorage near the Ambrose light tower where it was fully examined by personnel from the coastguard, custom services, FBI, Department of Energy and US Navy seals. It was eventually determined that

the radiation was being emitted by a container carrying clay tiles from Italy. Apparently, low level radiation is sometimes found in clay deposits. It was reported that the vessel operator incurred demurrage costs exceeding US\$50,000 while the vessel was being examined.

Other examples include Greek Special Forces detaining the cargo ship *Baltic Sky* on 22nd January, 2003 acting on a tip-off suggesting that it was carrying illegal explosives. Another example was the *Nisha* which was intercepted in the English Channel and detained on 21st December, 2001 as part of an operation by New Scotland Yard as a result of information obtained during intelligence led anti-terrorist operation. On 30th October, 2003, the *Athena* was boarded at Kunsan, South Korea due to the suspicion of Al Qaeda operatives being on board. The ship was denied entry into that port.

From the cases mentioned above,, it can be seen that the consequences of non-compliance can be very serious. Ships may be considered to constitute an immediate threat to security and denied entry to port or ports can be omitted from the "white list" of compliant ports and terminals.

DELAY

The Code (Part A paragraph 14.1) envisages delay for ships calling at ports and provides that security measures and procedures at a port facility will be applied in such a manner as to cause a minimum of interference.

Compliance with the ISPS Code may well affect the time and cost of ships' calls at port. This is anticipated because of the extra security measures on board and ashore leading to an extension of the time taken to load and discharge. In addition, the extra security required for personnel moving through ports, will inevitably lead to delays in getting contractors, surveyors and super cargo on board. The extra checks to be carried out by port state control are also likely to take further time. Therefore, when fixing ships on time charter, the allocation of these costs should be considered. Otherwise delays caused by complying with the code, or not as the case may be, could give rise to questions about who should pay.

BIMCO's US security clause for time charters provides that all costs and expenses arising out of the US security regulations should be for Charterer's account as a consequence of their employment of the vessel unless such costs are incurred solely as a result of Owners' negligence.

CHARTER PARTY CLAUSES

Arrived ship: If a port closes its waiting anchorage, there are undoubtedly going to be arguments as to when a ship will have "arrived". Therefore, it would be wise to amend charterparty definitions to deal with this eventuality. The English High Court has held that where a vessel has been refused permission to enter a port and has been ordered to wait outside the port by the port authority, she is not an "arrived ship" as mention during the case of *Johanna Oldendorff*^{xii}

Unsafe ports: The threat of terrorism is quite capable of making a port prospectively, physically and politically, "unsafe". However, it is anticipated that the classic definition of "unsafe port" is likely to be wide enough to include the operation of the ISPS Code as in *Eastern City*^{xiii}.

Under a time charter if Owners decide having considered all circumstances that a port is unsafe, time Charterers will generally be obliged to nominate an alternative port. However under a voyage charter if the voyage Charterer has nominated a safe port in the charter and that port subsequently becomes unsafe, the voyage Charterer is not obliged to make an alternative nomination. Unless there is express provision in the Charterparty dealing with such a situation, the vessel would either have to proceed to the nominated port in spite of it being "unsafe" or wait until the port is

considered to be safe once more. In such circumstances, the delay could conceivably be excessive enough to frustrate the voyage charter. It would, therefore, be sensible to consider inserting clauses into the voyage charter dealing with what should happen in this type of situation, for example, obliging Charterers to make an alternative nomination. In the absence of such an alternative nomination Owners could be permitted to sail to an alternative safe port of their choosing.

CONCLUSION

In conclusion, in the event of a terrorist incident occurring on board a vessel or at a terminal, the duties of care required by the most Courts are likely to be by reference to the ISPS Code. Therefore, failure by a vessel or a port to adopt these measures when required by law could result in the port or vessel being blacked listed leading to financial loss and liability on the part of the vessel for breaching their contractual obligations to provide a seaworthy vessel. If a vessel or cargo is detained for SOLAS security breaches where the carrier or the port fails to provide a secure vessel or port, they may be liable for consequential damage.

It is inevitable that there will be a period of uncertainty and that there may be problems due to the lack of uniformity in the Code's implementation in different ports by different flag states. In the meantime, existing and future contractual relationships should be checked to ensure the expected implications of the code are analyzed and dealt with as far as they can be.

Security measures undertaken by authorities must be dealt in harmony with human element issues, with consideration of the seafarer's rights as human being as well as rights enjoyed by them as a seafarer. Although laws do not oblige ship owners to provide seafarers with safe ships, it is important to ensure such provision are addressed and made important in line with other provisions as for the protection of property and the environment, addressed in other maritime conventions. It is of real importance that maritime laws for protection of seafarers and their human rights are made.

Addressing the issues mentioned above, the first approach ship-owners should take is to create and implement a new formula in ascertaining the number of crew required in different kind of ships. Creating this new formula would then assist the respective Marine officers in the Marine department in certifying ships and eventually render the management with a safe manning certificate, which would comply with requirements needed for effective implementation of Codes and Regulations for a safe and secured ship.

The task required to formulate the finding would be first to encourage the local ship owners in respective countries to identify and record the performance and time required for each of the major task carried out onboard and to be performed in the future. A full comprehensive shipboard duty would include task such as:

- 1) Cargo work
- 2) Ballast operations
- 3) Navigation
- 4) Engine operations
- 5) Auxiliary Equipment Operations
- 6) Radio Operations
- 7) Deck Operations-Pilot Boarding etc
- 8) General Operations, maintenance, etc
- 9) General Administration
- 10) Food and Cleanliness
- 11) Emergency Operations

To determine the manning requirement, the ship voyage profile and operating conditions were to be specified. For each shipboard function, the average time required was to be recorded, and then multiplied by its frequency of occurrence per voyage. This date would then be multiplied by the number of persons of a given skill needed to perform that function. This would give the total amount of time required by a person of a given skill to perform that specific function during the voyage. Dividing this figure by the total number of voyage days would give the average time per day required for that function and dividing this number by the average number of true working hours per day per person (10 hours- as per STCW) in that skill would give the number of persons required per day to run the ship. This would eventually produce the amount of personnel required for the ship to operate safely which should consist of deck officers, deck ratings, engineer officers, engine rating and catering staff.

The simplified formula is illustrated below:

- 1) Average time for shipboard duties x frequency of occurrence per voyage = A
- 2) A X number of person required to perform this duty = total amount of time required to perform that duty during that voyage = B
- 3) B/ total number of voyage days = average time per day to perform that duty = C
- 4) C/10 hrs = number of required persons per day = D
- 5) For every duties mentioned above the same calculation would be required and the sum of all the D's will result in the number of persons required to man the vessel safely.

Adoption of this formula would standardize the calculations for minimum safe manning onboard ships and it would be successful if proper data and record had been collected. This formula would enhance the quality of seafarer's onboard all type of ships and thus would comply as an ergonomically designed legislation towards a safe and secured trading environment.

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ⁱ International Labour Conference, Maritime Labour Convention, 2006

ⁱⁱ International Ship and Port Facility Security Code and SOLAS Amendments adopted on 12 December 2002 in ISPS Code 2003 edition Part A article 7 *Ship Security*, International Maritime Organization.

ⁱⁱⁱ International Ship and Port Facility Security Code and SOLAS Amendments adopted on 12 December 2002 in ISPS Code 2003 edition Part B article 4.28 *Ship Security*, International Maritime Organization

^{iv} ITF, *Out of Mind & Out of Sight, Seafarer's, Fishers and Human Right*, ITF Report 2006

^v Ibid.

^{vi} Fairplay, 2 December 2004 (Vol.352, No.6305) , pp 16-18

^{vii} Lloyd's List, 2 February 2006 (No.59095) , p 3

^{viii} Lloyd's List, 22 May 2006 (No.59170) , p 6

^{ix} Lloyd's List, 14 August 2006 (No.59229) , p 6

^x *Agular v. Standard Oil Company*, 1943, 318 US 724L Ed 1107, 63 S Ct 930, 143 AMC 451.

^{xi} " *Biometrics: too flaky to trust*," The Economist, December 2003.

^{xii} (1973) 2 Lloyd's Law Rep. 285

^{xiii} (1958) 2 Lloyd's Law Rep.127

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