



**UNION DE CAPITANES Y OFICIALES  
DE LA MARINA MERCANTE NACIONAL  
(Montevideo - Uruguay)  
Con Personería Jurídica**

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October 12, 2000

The Hon. Peter Morris (The Chairman)  
International Commission on Shipping.

In accord to ITF Circulars nr. 272/99, 78/00 and 131/00. please find below our comments.

Most of the clarifying questions expressed by ICONS Commissaries in their 'Information Paper, International Commission on Shipping (March, 2000)' are related with UNCLOS, ILO, IMO and IACS. The possibilities that their organizations may extend their resolutions, agreements and recommendations, in order to restrict directly and effectively the freedom of FOC ships would be subdued to possibilities that their own ordinances will permit them to do so.

Furthermore we also consider that it is of utmost importance a PSC more efficient and extended to many other ports applying strongly the controls and proceeding to the detention of ships in fault in any of the following items: security, environment rules and social matters.

On this subject (PSC), in our case (Uruguay), the controls are very limited so we are thinking make them more strict following the requirements of ITF. To accomplish this idea we are going to participate in a meeting with our Maritime Authority and several of our government departments involved in the subject, with the assistance that we shall request to some of the ITF Argentinian surveyors; i.e. Captains Alarcon and Andrealo.

We are confident that in this meeting we may set the basis for a rigorous control over the FOC ships calling to our ports. But we consider that the ways to reach a more effective control must be established by ICONS, that no doubt is better informed than us and will be able to answer properly the 16 clarifying questions of the ICONS Commissaries to oppose the sub-standard navigation habits, and so set standard proceedings for all the world.

That is all that we are able to inform your goodselves.

Wishing you the very best, we remain  
Truly Yours

Samuel D. Ferrand  
Executive Secretary



Miembros De: ITF - International Transport Workers Federation - London, England

Regional America Latina Y El Caribe - Rio De Janeiro - Brasil