

	<p align="center"><b>GOVERNMENT OF ANTIGUA AND BARBUDA</b></p> <p align="center"><b>DEPARTMENT OF MARINE SERVICES AND</b></p> <p align="center"><b>MERCHANT SHIPPING (ADOMS)</b></p> <p align="center"><b>Circular 01-002-04</b></p> <p align="center"><b>International Labour Organization (ILO)-</b></p> <p align="center"><b>Convention 147 and 180</b></p>	Document	Circ. 01-002-04
		Revision	00
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		Reference	ILO C 180, C 147  Director's Directive 02-2002  Circular 01-001-98  Directive 1999/95/EC

**Circular letter to**

**all companies having registered their ships under the flag of Antigua and Barbuda W.I.**  
**all ships registered under the flag of Antigua and Barbuda W.I.**

**Recommendation for the application of ILO Conventions 147 and 180 on board ships flying the flag of Antigua & Barbuda:**

Ships registered under the flag of Antigua and Barbuda should in principle comply with ILO Conventions No. 147 and 180, although Antigua and Barbuda is not party to those conventions. The requirements out of ILO Convention No. 147 and 180 are subject for inspection in several PSC MOUs.

Above all, Antigua and Barbuda flagged ships shall comply with the ADOMS Director's Directive 02-2002, dealing inter alia with hours of rest etc., and the ADOMS circular 01-001-98 which is based on section A-VIII/1 of STCW 1978, as amended.

The "no more favourable treatment" clause in the "Directive 1999/95/EC" of the European Parliament and of the Council, of 13 December 1999, clause 8, clearly outlines that:

*"..... ships flying the flag of a State which is not a party to ILO Convention No. 180 or the Protocol to ILO Convention No. 147 should not receive more favourable treatment than those flying the flag of a State which is party to either the Convention or Protocol or to both of them."*

That means any ship in European waters has to comply, and that Directive 1999/95/EC, clause 5, applies to all ships trading in EU waters:

*"The purpose of this Directive is to apply the provisions of Directive 1999/63/EC which reflect the provisions of ILO Convention No. 180, to any ship calling at a Community port, irrespective of the flag it flies, in order to identify and remedy any situation which is manifestly hazardous for the safety or health of seafarers; however, Directive 1999/63/EC includes requirements which are not to be found in ILO Convention No. 180 and which should not therefore be enforced on board ships not flying the flag of a Member State."*

Therefore, ships flying the flag of Antigua and Barbuda will also be judged under the same requirements as member ships.

Annex ILO C 180, Seafarers' Hours of Work and the Manning of Ships Convention, 1996.