

August 23, 2019

The Honorable Michael Pompeo
Secretary of State
U.S. Department of State
Washington, D.C. 20520

Dear Secretary Pompeo:

I write to respectfully ask you to review the recently published intention of the Department of State to revoke visas from seafarers who are employed on ships that assist the IRGC by transporting oil from Iran to Syria. SCI believes that such an action by the Department of State would unfairly penalize seafarers and jeopardize maritime safety and security.

Most seafarers working on commercial tankers are employed on contracts of up to twelve month's duration. Typically, oil tankers do not operate on regular schedules or routes. Rather, tankers' routes are determined by individual charters that are arranged by the vessels' owners or operators. Because tankers' cargos and routings are determined by vessel owners or operators, seafarers have no say in their vessel's routes or cargos. They are, however, obligated to live up to their employment contracts. Seafarers who refuse to work on their vessels would breach their employment contract and thereby jeopardize their careers. Seafarers could also be subjected to administrative or criminal penalties for refusing to work while at sea.

Global trade and maritime security depend on seafarers who operate merchant vessels. Shore leave is essential to seafarers' well-being and vessels' safe operations. In addition, seafarers have a key role as essential members of the maritime domain awareness security team through their ability to identify suspicious activity on their vessels and in ports, and report the activity to authorities. Seafarers have proven themselves to be valuable and reliable security assets. We believe that treating seafarers as if they were maritime security risks jeopardizes maritime safety and security.

We urge you to review Department of State policy to ensure that visas are not revoked from seafarers who had no advance knowledge of or ability to influence their vessels' routing or cargo.

Sincerely,

The Rev. David M. Rider
President & Executive Director
The Seamen's Church Institute of NY & NJ