



## FONASBA MEMBERSHIP SURVEY

BRAZIL – 16<sup>th</sup> April 2025

### BRAZIL Survey Results – e-BoL

Our colleagues in Brazil asked us to share a survey regarding the adoption of the electronic Bill of Lading (e-BoL) in member countries.

Globally, the shipping industry is steadily transitioning to digital documentation, with the e-BoL gaining increasing traction among stakeholders.

In Brazil, legal forums are actively discussing the implementation of e-BoL, with ship agents playing a key role in shaping regulations that aim to ensure the system's secure and reliable use by all parties involved.

As the national association representing ship agents in Brazil, FENAMAR contributed to this conversation by initiating this data collection through FONASBA.



# FONASBA MEMBERSHIP SURVEY

BRAZIL – 16<sup>th</sup> April 2025

## Survey Question:

### 1. Does your country already use e-BoL? [Yes or No]

COUNTRY	ASSOCIATION	Does your country already use e-BoL? [Yes or No]
Algeria	APAMA	No
ARGENTINA	CENTRO DE NAVEGACIÓN	No
Croatia	ASBA Croatia	Yes
Cyprus	Cyprus Shipping Association	No
Denmark	Danish Shipbrokers and Port Operators	No
DUBAI - U.A.E.	DSAA - DUBAI SHIPPING AGENTS ASSOCIATION	Yes
Great Britain	The Institute of Chartered Shipbrokers	Yes
GREECE	INTERNATIONAL MARITIME UNION IN GREECE	No
Hungary	HUNASBA	Yes
Israel	Israel Chamber of Shipping	Yes
Israel	Israel Chamber of Shipping	Yes
JAPAN	JAPAN ASSOCIATION OF FOREIGN-TRADE SHIP AGENCIES	Yes
KENYA	KENYA SHIPS AGENT ASSOCIATION	No
Netherlands	VNC	Not applicable
Portugal	AGEPOR	Yes
SPAIN	ASECOB	Yes
TURKEY	TURKISH SHIPBROKERS ASSOCIATION	Yes
Uruguay	Centro de Navegación	No

## 2. If “no”, are there plans or discussions in place to implement this? [Yes or No]

COUNTRY	ASSOCIATION	If “no”, are there plans or discussions in place to implement this? [Yes or No]
Algeria	APAMA	Yes
ARGENTINA	CENTRO DE NAVEGACIÓN	Yes
Croatia	ASBA Croatia	
Cyprus	Cyprus Shipping Association	Yes
Denmark	Danish Shipbrokers and Port Operators	Yes
DUBAI - U.A.E.	DSAA - DUBAI SHIPPING AGENTS ASSOCIATION	Not applicable
Great Britain	The Institute of Chartered Shipbrokers	Not applicable
GREECE	ONTERNATIONAL MARITIME UNION IN GREECE	No
Hungary	HUNASBA	Not applicable
Israel	Israel Chamber of Shipping	
Israel	Israel Chamber of Shipping	No
JAPAN	JAPAN ASSOCIATION OF FOREIGN-TRADE SHIP AGENCIES	
KENYA	KENYA SHIPS AGENT ASSOCIATION	Yes
Netherlands	VNC	Not applicable
Portugal	AGEPOR	
SPAIN	ASECOB	Not applicable
TURKEY	TURKISH SHIPBROKERS ASSOCIATION	
Uruguay	Centro de Navegación	No

### 3. Is there a specific legislation to regulate this? [Yes or No]

COUNTRY	ASSOCIATION	Is there a specific legislation to regulate this? [Yes or No]
Algeria	APAMA	No
ARGENTINA	CENTRO DE NAVEGACIÓN	Yes
Croatia	ASBA Croatia	Not applicable
Cyprus	Cyprus Shipping Association	No
Denmark	Danish Shipbrokers and Port Operators	No
DUBAI - U.A.E.	DSAA - DUBAI SHIPPING AGENTS ASSOCIATION	Yes
Great Britain	The Institute of Chartered Shipbrokers	Yes
GREECE	INTERNATIONAL MARITIME UNION IN GREECE	No
Hungary	HUNASBA	No
Israel	Israel Chamber of Shipping	Yes
Israel	Israel Chamber of Shipping	Yes
JAPAN	JAPAN ASSOCIATION OF FOREIGN-TRADE SHIP AGENCIES	No
KENYA	KENYA SHIPS AGENT ASSOCIATION	No
Netherlands	VNC	Not applicable
Portugal	AGEPOR	No
SPAIN	ASECOB	Yes
TURKEY	TURKISH SHIPBROKERS ASSOCIATION	Yes
Uruguay	Centro de Navegación	No

**4. If “yes”, a copy of this would be highly appreciated.** Please feel free to send a copy of the file to the FONASBA secretariat.

COUNTRY	ASSOCIATION	If “yes”, a copy of this would be highly appreciated. Please feel free to send a copy of the file to the FONASBA secretariat.
Algeria	APAMA	
ARGENTINA	CENTRO DE NAVEGACIÓN	ok
Croatia	ASBA Croatia	
Cyprus	Cyprus Shipping Association	
Denmark	Danish Shipbrokers and Port Operators	
DUBAI - U.A.E.	DSAA - DUBAI SHIPPING AGENTS ASSOCIATION	The UAE has enacted specific legislation that legally recognizes the use of electronic transferable records, including Electronic Bills of Lading. The key statutes are as follows: 1. Federal Decree-Law No. 43 of 2023 (Maritime Law): This is the principal maritime legislation currently in force in the UAE. Notably, it expressly recognizes the issuance and circulation of electronic maritime documents, including Bills of Lading. Article 163 1- The Bill of lading may be issued in any electronic means. 2- The electronic Bill of lading shall have the same power determined for the soft bill of lading, and it may be tradable through the electronic means which entails the same effects as the soft Bill of lading. 3- To recognize the validity of an electronic bill of lading, the following is required: a- That the bill of lading issuance or trading mean is one which can define its legitimate holder. b- The means of issuing or trading the bond must guarantee its safety. c- The means of issuing or trading the bill of lading guarantees its possessor the way to establish their possession of the bill. 2. Federal Decree-Law No. 46 of 2021 on Electronic Transactions and Trust Services: This legislation governs the legal validity of electronic records, digital signatures, and trust services. It aligns with the UNCITRAL Model Law on Electronic Transferable Records (MLETR), thereby reinforcing the recognition of e-B/Ls in both contractual and evidentiary contexts under UAE law. 3. Federal Law No. 50 of 2022 (Commercial Transactions Law): This law supports the broader use of electronic records in commercial and banking transactions and complements the maritime sector’s digital
Great Britain	The Institute of Chartered Shipbrokers	<a href="https://www.legislation.gov.uk/ukpga/2023/38/contents">https://www.legislation.gov.uk/ukpga/2023/38/contents</a>
GREECE	ONTERNATIONAL MARITIME UNION IN GREECE	
Hungary	HUNASBA	

# FONASBA MEMBERSHIP SURVEY

BRAZIL – 16<sup>th</sup> April 2025

Israel	Israel Chamber of Shipping	Not official yet.
Israel	Israel Chamber of Shipping	as this is legislation in process it is only in Hebrew. relates to the need of establishing an electronically available data base for Cargoes.
JAPAN	JAPAN ASSOCIATION OF FOREIGN-TRADE SHIP AGENCIES	
KENYA	KENYA SHIPS AGENT ASSOCIATION	Mombasa
Netherlands	VNC	
Portugal	AGEPOR	
SPAIN	ASECOB	MARITIME NAVIGATION LAW, ARTS 262-266 <a href="https://www.boe.es/buscar/act.php?id=BOE-A-2014-7877">https://www.boe.es/buscar/act.php?id=BOE-A-2014-7877</a>
TURKEY	TURKISH SHIPBROKERS ASSOCIATION	According to. Article 1526 of the Turkish Commercial Code
Uruguay	Centro de Navegación	

### 5. Any additional comments or insights regarding the adoption of the e-BoL in your country? (Open-ended text field)

COUNTRY	ASSOCIATION	Any additional comments or insights regarding the adoption of the e-BoL in your country? (Open-ended text field)
Algeria	APAMA	Our association lunched discussions with authorities (Ministry of transports and Customs) regarding this matter, we are still at first step.
ARGENTINA	CENTRO DE NAVEGACIÓN	
Croatia	ASBA Croatia	
Cyprus	Cyprus Shipping Association	Some shipping lines have introduced at some points E-Bills however they are not widely used in Cyprus by our members
Denmark	Danish Shipbrokers and Port Operators	The EU Commission are soon launching eFTI and EMDS which are both remedies towards electronic freight documents for different modes of transportation.
DUBAI - U.A.E.	DSAA - DUBAI SHIPPING AGENTS ASSOCIATION	The UAE continues to lead regional initiatives in digital trade facilitation. Through its Free Zones, Customs Authorities, and digital infrastructure providers, the country is advancing towards a paperless trade environment. Nevertheless, the widespread adoption of e-B/Ls across all stakeholders—especially SMEs, insurers, and financial institutions—requires ongoing regulatory guidance, training, and alignment. The legal foundation is firmly in place, and the operational environment is progressively adapting.
Great Britain	The Institute of Chartered Shipbrokers	September 2023 the UK 's Electronic Trade Documents Act ("the Act"), giving legal recognition in English law to electronic trade documents, including E-bills. The Act meets the requirements of the Model Law on Electronic Transferable Records (MLETR), a uniform model law adopted by the UN Commission on International Trade law (UNCITRAL) in 2018
GREECE	ONTERNATIONAL MARITIME UNION IN GREECE	
Hungary	HUNASBA	
Israel	Israel Chamber of Shipping	A rough estimate reveals that today only about 15% of the bills of lading are the original type and e-BoL. The rest are Waybill. However the e-Bol is making progress consistenly. .It is not the country. It is the companies/agents
Israel	Israel Chamber of Shipping	



## FONASBA MEMBERSHIP SURVEY

BRAZIL – 16<sup>th</sup> April 2025

JAPAN	JAPAN ASSOCIATION OF FOREIGN-TRADE SHIP AGENCIES	Nothing
KENYA	KENYA SHIPS AGENT ASSOCIATION	YES
Netherlands	VNC	Please find read the following message from the shippers association which might be helpful, so please use 'Google translate' => <a href="https://www.evofenedex.nl/magazines/electronic-bill-of-lading-waarschijnlijk-in-2025-ingevoerd">https://www.evofenedex.nl/magazines/electronic-bill-of-lading-waarschijnlijk-in-2025-ingevoerd</a>
Portugal	AGEPOR	
SPAIN	ASECOB	
TURKEY	TURKISH SHIPBROKERS ASSOCIATION	
Uruguay	Centro de Navegación	