

Version	Date	Modification details	Editor
4.1	1.10.2025	Revision history added, updates on 1.1, 1.5, 1.6, 1.11. New point added for MRV 1.13, MED 1.19, Lifting appliances 1.22, Tonnage 1.23 and Interpretations 1.24	Toni Karppinen
4.2	6.11.2025	1.1 Statutory Conditions, revised based on the comments received and discussion at RO meeting 4.11.2025. New item added for treated sewage 1.23. Typo removed. 1.21. Additional clarification	Toni Karppinen

Guidance notes for performing statutory work on behalf of Traficom

The purpose of this document is to ensure consistency by providing clarification of flag interpretations when ROs perform statutory work on behalf of Traficom. The document is intended to be amended whenever new subjects in need of clarification arise.

1.1 Statutory Conditions

Any detainable statutory conditions, except those solely covered by Classification Rules connected to SOLAS II-1/3-1 shall be issued by Traficom. Issuing a short-term certificate due to the conditions is not normally needed. Exemptions are issued by Traficom, see Annex 1, point 3.1.

Detainable Deficiencies

If a ship's condition, equipment, manning, operation, or crew conditions do not comply with statutory certificates, or if the ship is not seaworthy, the RO surveyor must inform the flag State authorities, and the shipowner must apply for any temporary exemptions or conditions.

If in a foreign port, the RO must ensure the port state is notified.

Minor Statutory Deficiencies

If minor deficiencies remain at survey completion, issue a statutory condition with a due date.

No short-term or conditional certificates.

1.2 Change of Home Port or Ship Name

New certificates shall be issued if the Home Port or the ship name changes. The language of the Homeport shall in all documents be consistently in either the Finnish or the Swedish name of the Home Port.

1.3 Load line grid letters of the issuing authority

Until the end of 2016 the grid letters on the ship side at the load line mark have been "SL" for Finnish flagged vessels

The grid letters shall be replaced with the RO's letters when the RO issues the new LL certificate. The corresponding letters shall be written in the certificate.

The LL certificate and the LL grid letters shall at all times be consistent, i.e. the letters in the certificate shall reflect the grid letters at the load line mark.

1.4 Multiple load line certificates

Case by case authorisation from Traficom is required for the first issue of multiple load line certificates. A surveyor shall attend the ship at each change of load line and Traficom shall be informed of the change. Traficom must be informed of any changes of load line that have an influence on the Net Tonnage (NT) as the NT influences the fairway dues (Act on Fairway Dues 1122/2005).

1.5 Control of sea inlets

In manned machinery spaces main and auxiliary sea inlets and discharges in connection with the operation of machinery may be controlled locally. The controls shall be readily accessible and shall be provided with indicators showing whether the valves are open or closed.

In periodically unattended machinery spaces the valves for main and auxiliary sea inlets and discharges in connection with operation of machinery, except valves for discharges having the outboard end above the deepest load water line, shall normally be capable of being closed from a position above the freeboard deck.

Traficom accepts the controls of such valves to be located at a platform below the freeboard deck provided calculation as follow:

A calculation is carried out to show that the time taken from alarm activation plus the time* to reach and fully close manually operated or powered valves is less than the time taken for the influx of water to reach the control without submergence of the platform on which the person is operating the valve.

(* The time it will take to reach and close the sea valves should be determined by multiplying the inverse of the nominal speed of travel of a person onboard (1.0 m/sec based on the values taken from MSC/Circ.1033) times the distance to be travelled from the platform in way of manually operated valves (or the actuator for valves controlled by stored mechanical energy) to either:

- (i) the highest position of the control room for an ER under continuous manned supervision; or
- (ii) from the navigation bridge for an unmanned ER.

The time it takes for the influx of water into the ER should be determined based on the fluid dynamic principles contained in MSC.245(83) applied to a breach in the largest diameter seawater line in the lowest and highest locations in the ER and the valve associated with that seawater line.)

In the event calculations are not available, 10 minutes shall be regarded as adequate time for operation.

Traficom also accepts that the controls for seawater inlet and discharge valves may be grouped in one or two locations. If the controls are located in two groups, then there should be clear access between the two control positions.

1.6 MARPOL V

Garbage Record Book shall be approved by Administration.

All Finnish flag vessels covered by MARPOL V are to be surveyed for compliance with regulation 10 and issued with a factual statement detailing that a garbage management plan is on board and that the required placards are provided.

1.7 Stability

The RO is authorized to approve both intact and damaged stability of ships, including ships originally approved by Traficom.

Footnote 6 in Explanatory Notes to the 2008 IS Code is applied by Traficom and shall also be applied by the RO.

1.8 Dry docking extended past the five year interval

Traficom's regulation for surveys of ships (Ch. 4) sets the period between renewal surveys to five years for cargo ships.

Approval for Extended Dry-docking (EDD) scheme and exemption for postponing a dry docking are issued by Traficom.

1.9 Bottom survey afloat for cargo ships

Bottom survey afloat can be carried out according to the requirements set in latest IMO Survey Guidelines Under The Harmonized System Of Survey And Certification (HSSC).

1.10 Data Collection System for Fuel Oil Consumption of Ships

TRAFICOM has issued the Regulation Reporting of ship fuel oil consumption data and procedures for verification thereof TRAFI/613265/03.04.01.00/2018 for Administration verification and transferring of ship fuel oil consumption data to IMO GISIS database. This Regulation implements nationally the requirements in Resolution MEPC.292(71) *2017 Guidelines for Administration Verification of Ship Fuel Oil Consumption Data*.

In relation to MEPC.1/Circ.913 Guidance on the application of the amendments to Appendix IX of MARPOL Annex VI adopted by resolution MEPC.385(81), Traficom has issued following national interpretation. For ships flying the flag of Finland, the MARPOL amendments will enter into force on 1 August 2025 (with no early implementation) and therefore ships should update SEEMP Part II by 1 January 2026 and collect data with the enhanced granularity from 1 January 2026. However, the shipping company may voluntarily update SEEMP Part II by 1 January 2025 and collect data with the enhanced granularity starting from 1 January 2025 for the whole year 2025.

1.11 Monitoring, reporting and verification of carbon dioxide emissions from maritime transport (MRV)

EU Regulation 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport, and amending Directive 2009/16/EC

The national accreditation body for accreditation of verifiers is FINAS.
<https://www.finas.fi/sites/en>

1.12 Approving the shipping MRV verifiers

According to Finland's Emissions Trading Act 1270/2023 the shipping MRV verifier must apply for approval from Traficom. The requirements for the verifier are listed in Section 79 of the Emissions Trading Act 1270/2023. The requirements concerning the verifier of maritime transport emissions trading are also stipulated in Regulation (EU) 2023/957 of the European Parliament and of the Council.

1.13 ECDIS –updates, compliance with IHO standards

Traficom does not require the ECDIS software to be updated to the latest version but compliance with the latest IHO standards is mandatory for ships flying Finnish flag.

Compliance with the latest IHO shall be verified onboard by the basis of the work report issued by manufacturer

1.14 Electronic logbooks

Electronic deck, engine and radio logbooks may be used. Software has to be approved by Traficom.

1.15 Requirements for certification of radio personnel and Form R

On vessels engaged on international voyages, all deck officers shall hold Restricted Operators Certificate (ROC).

On vessels operating in sea areas A2, A3 and A4, at least one of the deck officers shall also hold a General Operator's Certificate (GOC).

This should be marked under Form R "minimum number of person needed to operate the radio installations" as 1 (one).

This indicates that there is one dedicated person for responsible of radio station

1.16 Portable aeronautical VHF equipment on passenger ships

In recommendation on performance standard for on-scene (aeronautical) portable two-way VHF radiotelephone apparatus (Resolution MSC.80 (70)) is stated that: *"The source of energy should be a primary battery integrated in the equipment and may be replaceable by the user. In addition, provision may be made to operate the equipment using an external source of electrical energy."*

Traficom sees that portable aeronautical VHF should be equipped with operational (primary) battery and power/charger supply provided by manufacturer. Traficom does not require mentioned operational (primary) battery to be marked with expiry date unless battery is sealed for emergency use.

Traficom accepts CE marked portable aeronautical VHF equipment, complying with the performance standard.

1.17 Use of remote survey

Remote survey may be performed according to Survey Guidelines Under The Harmonized System Of Survey And Certification (HSSC).

1.18 MED equipment onboard

Before issuing any initial Certificates, RO must ensure that all marine equipment onboard is in accordance with the Marine Equipment Directive, equipment's Declaration of Conformity (DoC) is onboard and a list of the equipment is made. A

copy of the list to be kept onboard and updated. Same verification has to be done before certificates are issued during change of flag.

1.19 Survey of non-convention ship

Appendix 1 Degree Of Authorization paragraph 4.4. states that *Non-convention ship may be surveyed by the RO if agreed with Traficom.*

The RO may survey any vessel or part of vessel, not covered by international conventions and codes.

Before the first survey, the RO has to send to Traficom information about which vessel or vessels it will be surveying and which parts of the vessel are outside of the international conventions and codes.

All surveys falling outside of the international conventions and codes need to be reported in the Purkki-system.

1.20 Tonnage measurement and issuing of International Tonnage Certificate

The RO is authorized to carry out tonnage measurement and perform tonnage calculations according to the 1969 International Convention on Tonnage Measurement for Finnish ships. Traficom will issue the International Tonnage Certificate unless exceptional circumstances require that the RO issues the certificate. In such exceptional circumstances, case-by-case authorization is needed in order for the RO to issue the International Tonnage Certificate.

When the RO carries out the tonnage measurement and performs tonnage calculations the following information shall be submitted to Traficom:

- Tonnage measurement sheet or other documentation on the determining of the volume of the enclosed spaces and cargo spaces.
- The tonnage calculation
- A draft of the Tonnage Certificate

1.21 Lifting appliances

As per Agreement annex 1. No changes due the new SOLAS amendments 1.1.2026. Lifting appliances remains under the Ministry of Social Affairs and Health. Current regulation fullfills the new SOLAS amendments, so no changes regarding certification nor RO scope.

1.22 Traficom interpretations of international maritime conventions and regulations.

General notes for interpretations

The RO shall inform Traficom if any communication with IMO, or any agreement with other Governments, is needed.

Unless expressly provided otherwise; exemptions, equivalents and exceptions are to be handled by Traficom. Footnotes are to be complied with. Order to be followed to find an interpretation:

1. Interpretations from Traficom are to be followed. If not available,
2. Interpretations in IMO Resolutions and Circulars are to be followed. If not available,
3. Interpretations in IACS UI supported by IMO are to be followed. If not available,

4. Traficom must be consulted with

National interpretations can be found from

<https://www.traficom.fi/fi/liikenne/merenkulku/imon-yleissopimusten-tulkinnat>

1.23 National discharge bans for treated sewage, scrubber discharge water and grey water.

Finnish national Act on Environmental Protection in Maritime Transport 1672/2009 sets discharge bans for treated sewage, open and closed loop scrubber discharge water and grey water. <https://www.traficom.fi/en/DischargeBans>

Regarding the treated sewage tanks, Annex IV of the MARPOL Convention currently does not recognize the term "treated sewage". Consequently, Annex IV requirements for sewage tanks do not apply, e.g. it is not necessary to record treated sewage tanks in the ship's ISPP Certificate. However, conversion of ship tanks requires updates to ship's tank plan.