

Version	Date	Modification details	Editor
1.0	29.08.2023	First issue for new system	Patrik Bussman
1.1	28.2.2024	Organisation updated, General notes added	Toni Karppinen

## National interpretation regarding IMO Publication

International Convention on Load Lines (ICLL 1966) as amended

### General notes for interpretations

Whenever this document refers to a recognised organization (RO) or classification society, it means recognised organisation authorised by the Finnish Transport and Communications Agency Traficom.

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.

### ICLL

<b>Annex B</b>	
<b>Annex I</b>	
<b>Chapter I</b>	
<b>General</b>	
<b>Reg. 1</b>	<b>Strength and intact stability of ships</b>
(3)	Regarding stability criteria Traficom applies the IS-code.
<b>Reg. 2</b>	<b>Application</b>
(3)	Traficom have no additional freeboard requirements for ships designed to carry sail.
(4)	Ships of wood or of wood on iron frames, or of other materials the use of which Traficom has approved, or ships whose constructional features are such as to render the application of the provisions of this regulation unreasonable or impracticable shall be assigned freeboards as determined by Traficom on a case by case basis.

<b>Reg. 7</b>	<b>Mark of assigning Authority</b> The mark of the recognized classification society by whom the load lines are assigned may be indicated alongside the load line ring instead of the letters "S L".
<b>Reg. 8</b>	<b>Details of marking</b> Traficom interpretation of permanently marked is that the ring, lines and letters, or at least the contours of those, shall be welded on to the hull or be cut/milled into the hull. For ships constructed of fibre composites, painted ring, lines and letters are accepted.

<b>Chapter II</b> <b>Conditions of assignment of freeboard</b>	
<b>Reg. 10</b>	<b>Information to be supplied to the master</b> See interpretation of Regulation 1 above.
<b>Reg. 11</b>	<b>Superstructure end bulkheads</b> The strength of bulkheads and end of enclosed superstructures shall fulfil the requirements of a recognised organisation.
<b>Reg. 12</b>	<b>Doors</b>
(2)	Through individual decision, Traficom may accept a door to be opened inwards. Application is to be sent to Traficom by the RO. Application shall in addition to relevant data and documentation, include the opinion of the RO on the issue.
<b>Reg. 14</b>	<b>Cargo and other hatchways</b>
(1)	Through a individual decision, Traficom can permit cargo and other hatchways to be constructed in accordance with regulation 15. Application is to be sent to Traficom by the RO. Application shall in addition to relevant data and documentation, include the opinion of the RO on the issue.
(2)	Exposed hatchways on decks above the superstructure deck shall be protected by weather-tight closing appliances. Other arrangements may be accepted by the Traficom through an individual decision. Traficom do not require any special coaming height for hatchways in this position.
<b>Reg. 14-1</b>	<b>Hatchway coamings</b>
(2)	Regarding acceptance of reduced coaming heights, Traficom can accept these decisions to be made by the recognised organisation under the condition that the following requirements are fulfilled: <ul style="list-style-type: none"> <li>•The hatch complies with the strength requirements given in ICLL regulation 16(2) to (5),</li> <li>•The hatch also complies with requirements of a recognised organisation with respect to strength and closing appliances.</li> <li>•The hatch is to be kept closed at sea at all times and marked accordingly when the vessel is at sea.</li> </ul>

<b>Reg. 15</b>	<b>Hatchways closed by portable covers and secured weathertight by tarpaulins and battening devices.</b>
(7)	Strength and stiffness of covers made of materials other than mild steel shall be equivalent to those of mild steel. Traficom accepts the decision made by a recognised organisation.
<b>Reg. 16</b>	<b>Hatchways closed by weathertight covers of steel or other equivalent materials</b>
(1)	Devices to secure and maintaining the weathertightness shall be of sufficient strength, i.e. relevant ISO-standards or regulations of a recognised organisation.
(6)	Alternative means for securing and maintaining the weathertightness are to be accepted by Traficom. Application is to be sent to Traficom by the RO. Application shall in addition to relevant data and documentation, include the opinion of the RO on the issue.
<b>Reg. 19</b>	<b>Ventilators</b>
(3)	These openings do not need to be fitted with closing devices.
<b>Reg. 20</b>	<b>Air pipes</b>
(2)	Through individual decision by Traficom a lower height may be accepted. Application is to be sent to Traficom by the RO. Application shall in addition to relevant data and documentation, include the opinion of the RO on the issue.
<b>Reg. 21</b>	<b>Cargo ports and other similar openings</b>
(1)	Through individual decision, Traficom may accept a cargo port to be opened inwards.
(2)	Through individual decision, Traficom may permit cargo ports and other similar openings with their lower edge below the line specified in this paragraph. Application is to be sent to Traficom by the RO. Application shall in addition to relevant data and documentation, include the opinion of the RO on the issue.
(5)	Doors in this regulation shall be in compliance with regulations by a recognised organisation.
<b>Reg. 22</b>	<b>Scupper, inlets and discharges</b>
(6)	All pipes to which this regulation refers shall be of steel or other equivalent material accepted by a recognised organisation.
<b>Reg.25</b>	<b>Protection of the crew</b>
(2)	The height of bulwark and guard rails may be reduced through individual decision from Traficom if adequate protection is provided. Application is to be sent to Traficom by the RO. Application shall in addition to relevant data and documentation, include the opinion of the RO on the issue.

<b>Chapter III</b>	
<b>Assigning freeboard</b>	
<b>Reg. 27</b>	<b>Types of ships</b>
Table 27.1	For ships with a length over 200 meter, Traficom determines the freeboard in every individual case based on proposal from a recognised organisation.
(13e)	Unprotected openings are not allowed to be immersed within the range of residual stability. Watertight openings, openings fitted with weather tight appliances and side scuttles not being able to open, are however allowed to be immersed.
(13f)	The stability during intermediate stages of flooding shall be sufficient.
<b>Reg. 28</b>	<b>Freeboard tables</b>
Table 28.1 & 28.2	For ships with a length over 365 meters, Traficom determines the freeboard in every individual case based on proposal from a recognised organisation.
<b>Reg. 39</b>	<b>Minimum bow height and reserve buoyancy</b>
(3)	Traficom can through individual decision permit alternative solutions for ships who is constructed to meet exceptional operational requirements. Application is to be sent to Traficom by the RO. Application shall in addition to relevant data and documentation, include the opinion of the RO on the issue.
<b>Reg. 44</b>	<b>Stowage</b>
(6)	Traficom general advice states that the Code for carrying of timber deck cargo shall be followed.
(9)	Alternative arrangements may be used after Traficom individual decision.