



**IMO MEMBER STATE AUDIT SCHEME**

**AUDIT OF FINLAND**

**28 OCTOBER TO 4 NOVEMBER 2024**

**FINAL REPORT**

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## 1 Introduction

1.1 The IMO Member State Audit Scheme creates a basis to assess the extent to which a Member State complies with its obligations set out in the various IMO instruments to which it is a Party. In addition, the *IMO Instruments Implementation (III) Code* (resolution A.1070(28)) stipulates a number of principles a Member State should adhere to, in order for its maritime administration to deliver on its obligations and responsibilities, with respect to maritime safety and protection of the marine environment, and to be capable of improving its performance in the discharge of its duties.

1.2 This report has been drafted in accordance with the *Framework and Procedures for the IMO Member State Audit Scheme* (resolution A.1067(28)).

1.3 The audit of Finland was undertaken from 28 October to 4 November 2024, by three auditors drawn from Namibia, United Kingdom and the IMO Secretariat. The scope of the audit included the flag, coastal and port State obligations of Finland in relation to the mandatory IMO instruments to which it was a Party.

1.4 The audit team was appointed by IMO on 24 July 2024.

1.5 The updated pre-audit questionnaire (PAQ) and additional pre-audit information (based on the model in Annex 3 of document C 125/6/1), as provided by Finland, was submitted to the audit team members on 24 July 2024. The PAQ and the additional pre-audit information were major documents for the preparatory work of the audit team prior to the audit.

1.6 The Memorandum of Cooperation (MoC) between Finland and IMO, concerning participation in the IMO Member State Audit Scheme, was signed on 28 February 2024.

1.7 The detailed audit timetable and programme regarding the audit of Finland was confirmed on 25 October 2024.

1.8 The opening meeting was held at Helsinki, Finland on 28 October 2024. Those entities of the State that were involved in the implementation and enforcement of the provisions of the various mandatory IMO instruments and which were represented at the meeting were:

- .1 Prime Minister's Office;
- .2 Ministry of Transport and Communications (MINTC);
- .3 Ministry of the Environment (MOE);
- .4 Ministry of Finance (MOF);
- .5 Ministry of the Interior (MOI);
- .6 Ministry of Justice (MOJ);
- .7 Ministry of Education and Culture (MOEC);
- .8 Ministry of Social Affairs and Health (MOSAH);
- .9 Ministry of Economic Affairs and Employment (MOEAE);
- .10 Finnish Transport and Communications Agency (Traficom);
- .11 Finnish Transport Infrastructure Agency (FTIA);
- .12 Finnish Meteorological Institute (FMI);
- .13 Finnish Border Guard (FBG);
- .14 Finnish Environment Institute (FEI);
- .15 Fintraffic VTS;
- .16 Safety Investigation Authority, Finland (SIAF);
- .17 Regional State Administrative Agency, Occupational Safety and Health Division (AVI); and
- .18 Centre for Economic Development, Transport and the Environment (ELY).

1.9 The closing meeting was held on 4 November 2024 in Helsinki, Finland.

1.10 The following report provides a detailed account of the findings and the evidence on which the findings are based. Additional information on the findings, along with the corrective actions provided by the State can be found in the appendices to this report.

## **2 Background**

2.1 The current audit of Finland was undertaken using fully the principles established under the *Framework and Procedures for the IMO Member State Audit Scheme* and the III Code. This report sets out the outcome of this audit in the format adopted under section 7.2 of the Procedures for the Scheme.

## **3 Members of the Audit Team**

.1	Mr. Prasad Panicker (United Kingdom)	Audit Team Leader
.2	Mr. Pinehas Auene (Namibia)	Audit Team Member
.3	Mr. Vasudeva Aji (IMO Secretariat)	Audit Officer

## **4 Involved Officials from the Member State**

The list of officials involved is set out in annex 2.

## **5 Acknowledgement**

5.1 The auditors wish to express their considerable thanks to the Finnish Transport and Communication Agency (TRAFICOM) and other entities of the State for their fullest cooperation during this audit. In particular, thanks are due to Ms. Hanna Suutarla, Special Advisor (IMSAS), as the Single Point of Contact, for her efforts during the preparation for this audit and for its facilitation.

## **6 Scope, objectives and activities of the Audit**

6.1 The Scope of the audit addressed flag, coastal and port State obligations of Finland.

6.2 The objectives of the audit were:

- .1 to determine the extent that Finland met the obligations imposed upon it through its adoption of the following applicable mandatory IMO instruments:
  - .1 the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 1974);
  - .2 the Protocol of 1988 relating to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS PROT 1988);
  - .3 the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto, as amended (MARPOL 73/78);
  - .4 the Protocol of 1997 to amend the International Convention for the Prevention of Pollution from Ships, as modified by the Protocol of 1978 relating thereto (MARPOL PROT 1997);
  - .5 the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW 1978);
  - .6 the International Convention on Load Lines, 1966 (LL 1966);

- .7 the Protocol of 1988 relating to the International Convention on Load Lines, 1966 (LL PROT 1988);
  - .8 the International Convention on Tonnage Measurement of Ships, 1969 (TONNAGE 1969); and
  - .9 the Convention on the International Regulations for Preventing Collisions at Sea, 1972, as amended (COLREG 1972); and
- .2 the effectiveness of the implementation of these objectives.

6.3 The audit was conducted using the programme set out at annex 1. The methodology used was to establish through a series of visits, interviews, examination of written records and databases, the objective evidence which would determine the extent to which the maritime administration achieved the objectives.

6.4 The programme followed a process which sought initially to determine the strategy for the implementation of the mandatory IMO instruments, the review processes in place and the arrangements for continual improvement. Following this, an examination of the national legislation in place and which provides the instruments with force of law was undertaken. The processes by which the State develops and makes known its interpretations, policies and instructions regarding these instruments, as well as the practical implementation of these arrangements were also reviewed.

6.5 An opening meeting was conducted on Monday, 28 October 2024 at the Ministry of Environment, Helsinki, in accordance with the Procedures and agenda and list of attendees is attached as annex 2. At the closing meeting, which was held on Monday, 4 November 2024 at the Ministry of Finance, Helsinki, a draft interim report was tabled to assist in focusing discussion and the next steps to be taken.

## **7 Overview and general maritime activities of the State**

### **General**

7.1 The maritime administration of Finland was divided between seven ministries and their subordinate entities. Annex 3 sets out in diagrammatic format the general structure of the entities involved in the implementation of the mandatory IMO instruments.

7.2 The Prime Minister's Office coordinated the maritime policies in the State.

7.3 The Ministry of Transport and Communications (MINTC) was the primary entity responsible for maritime transport and the implementation of the mandatory IMO instruments. MINTC coordinated with other ministries that had a role in the maritime and environmental matters. The entities within MINTC responsible for implementation of the mandatory IMO instruments were: the Finnish Transport and Communications Agency (Traficom), the Finnish Transport Infrastructure Agency (FTIA), and the Finnish Meteorological Institute (FMI).

7.4 Traficom was responsible for supervising the seaworthiness of ships, equipment and manning, maritime education and training, ship surveys, authorizing surveyors and recognized organizations (ROs), hydrographic services, vessel traffic services, radiocommunication services, aids to navigation (AtoN) services and port State control (PSC). Traficom also had certain duties related to the protection of the marine environment.

7.5 The FTIA was responsible for maintaining fairways and AtoN, as well as fairway planning and surveys in waterways to ensure the safety and smooth operation of ships sailing on fairways. FTIA was the entity responsible for arranging vessel traffic services.

7.6 The FMI provided meteorological services in the State.

7.7 The Ministry of the Environment (MOE) was responsible for environmental protection and the prevention of environmental damage.

7.8 The Ministry of the Interior (MOI) was responsible for providing rescue services, environmental damage response and prevention, emergency response centre operations and maritime search and rescue (SAR) operations.

7.9 The Ministry of Justice (MOJ) was responsible for legislative editing and drafting the key legislation maintaining the legal order and for ensuring the proper functioning of the judicial system

7.10 The Ministry of Education and Culture (MOEC) was responsible for maritime education and training.

7.11 The Regional State Administrative Agency under the Ministry of Social Affairs and Health (MOSAH) investigated occupational accidents on ships.

7.12 Åland, an archipelago in the Baltic Sea, was an autonomous region of Finland. In relation to the mandatory IMO instruments, Åland was bound by the maritime legislation of Finland. IMO instruments that concerned matters falling in the legislative powers of Åland, such as in the field of environmental protection, had to be approved by the Åland Parliament.

## **Strategy**

7.13 The State had established a National Preparation and Coordination Group (the Group) chaired by MINTC by including all relevant entities of the maritime administration. All entities were involved during the preparation, including annual reviews. The Group had developed a document titled "Policies on procedures for the promulgation of the mandatory instruments of the International Maritime Organization (IMO) and for ensuring the compliance of the maritime administration" (or "the Policy Document").

7.14 The Policy Document stated the responsibilities of the entities in the maritime administration and the processes for adoption and implementation of the mandatory IMO instruments. It also provided the procedures and processes for measuring and monitoring its performance and continual improvement through periodic reviews and described the process for setting goals and resources. Furthermore, the strategic objectives for the maritime administration were reviewed and updated after a new government assumes office every four years maintaining continuity.

7.15 The organization and responsibilities of the ministries and agencies in the maritime administration were documented through legislation. The ministries steered their subordinate entities by establishing specific objectives. The objectives of individual entities were achieved through normative goal setting and tactical planning, and several entities had established quality management systems (QMS) to perform their tasks. The overall functioning of the entities/ministries was monitored through review of performance agreements and achievements, internal audits and external evaluations. The operations of the entire maritime administration were reviewed annually by the Group through a management review to facilitate continual improvements. The records showed that Group had carried out reviews in October 2023 and August 2024.

## Legislation

7.16 According to the Constitution of Finland, the State followed the dualistic system, which meant that an international treaty had to be implemented through national law in order to enter into force in the State. The legislative power in the State was vested in the Parliament in conjunction with the President of the State. According to Section 95 of the Constitution, the provisions of international treaties and obligations of a legislative nature were brought into force by an Act of Parliament. In case of subordinate legislation, these obligations were brought into force through decrees or regulations, supplemented by guidelines and instructions.

7.17 To give effect to an international treaty or its amendments, a legislative bill to the Parliament was drafted by the concerned ministry (Government Rules of Procedure (262/2003)). On approval of the bill by the Parliament, the bill was adopted as a new act (or an amendment to an existing act) and ratified by the President. The President, the Government and a ministry could issue subordinate legislation (decrees or regulations) on the basis of the powers delegated through an Act.

7.18 The MINTC was responsible for implementation of the mandatory IMO instruments and their amendments, in coordination with other entities in the maritime administration. A legislative plan was in place to give effect to the mandatory IMO instruments in a timely manner, which was regularly updated. In case a delay was anticipated in transposing an amendment to the mandatory IMO instrument, an objection to the said amendment was communicated to IMO and said objection was withdrawn after an appropriate law was promulgated. Records showed that national legislation had been promulgated for the mandatory IMO instruments and their amendments that entered into force for the State.

7.19 The maritime administration had legal personnel with maritime expertise to transpose the mandatory IMO instruments into national legislation. Designated competence and areas of responsibility were defined.

7.20 The primary legislation that incorporated the mandatory IMO instruments were:

- .1 Decree on the implementation of the International Convention for the Safety of Life at Sea, 1974 (Treaty Series 11/1981);
- .2 Decree on the implementation of the 1978 Protocol to the International Convention for the Prevention of pollution from ships, 1973 (51/1983);
- .3 Ship Safety Control Act (370/1995);
- .4 Act on Transport Services (320/2017);
- .5 Act on Environmental Protection in Maritime Transport (1672/2009);
- .6 Act on the Technical Safety and Safe Operation of Ships (1686/2009);
- .7 Act on Ships' Crews and the Safety Management of Ships (1687/2009);
- .8 Water Traffic Act (728/2019);
- .9 Maritime Search and Rescue Act (1145/2001); and
- .10 Safety Investigation Act (525/2011).

## Records and improvement

7.21 The Policy Document and its annexes were developed in coordination with the entities in the maritime administration. The strategy, related documents and records were communicated to all entities, stakeholders and the public through the Government's Project Window service.

7.22 Finlex, owned by Ministry of Justice (MOJ), provided an online database of up-to-date legislative and other judicial information of Finland to all stakeholders.

7.23 Communication of information to IMO was primarily done through the GISIS platform. Individual entities were responsible to update data in GISIS and a list of designated persons had been established with Traficom as the administrator. A review of GISIS reports for the State indicated that some of the information had not been communicated. (See FD-1)

7.24 The records management system in the State was regulated by the Archives Act (831/1994) and Public Information Management Act (906/20019). This system was implemented by entities in the maritime administration for creation, retention, storage, retrieval and disposition of records. Documents requiring permanent storage were transferred to the National Archives. The documents and records requested during the audit were accessible and easily retrieved.

7.25 In order to promote a culture of safety and pollution prevention, annual joint exercises on safety and pollution prevention were held regularly (e.g. 42 multi-authority oil spill exercises and 41 multi-authority SAR exercises were held in 2023). In addition, a "Sea Sunday maritime safety award" had been established in 1997 to encourage a safety culture. The recognition was awarded to a crew member, shipowner, authority or other entity who promoted maritime safety to a meritorious extent. Other incentives were also in place, such as waste reception facilities without charges for certain ships, reduced fairway dues for ships with higher ice class notations and exemptions from compulsory pilotage for some ships.

7.26 An annual performance review of the maritime activities was being carried out towards continual improvement based on the Policy Document. In the review, each entity reported on its own activities. Existing and potential non-conformities identified during these reviews were monitored and addressed, as appropriate. The records of annual reviews held in 2023 and 2024 were available.

## 7.27 Findings (FD)

- .1 The State had not fulfilled some of its obligations regarding communication of information to IMO under the mandatory IMO instruments (e.g., specimen of certificates, information on text of laws/regulations) (SOLAS 1974, article III; III Code, paragraph 9). See Form A, FD-1

### Corrective action

The maritime administration will implement the following actions:

- .1 develop a reporting manual for the maritime administration, including a GISIS user manual, documenting the tasks for each organisation, taking IMO resolution A.1139(31) on communication of info to IMO into consideration;
- .2 require each responsible entity to review the register of obligations stemming from the mandatory IMO instruments, identify the reporting and communication responsibilities falling within its remit, and assess their transposition into national legislation; and
- .3 produce introductory familiarization material for public administration personnel to raise awareness of maritime governance, responsibilities under IMO instruments, applicable national legislation, building on the materials prepared for the audit. The GISIS contact point list will also be

updated, with the understanding that the person designated therein will act, for each entity, as the designated person who understands the basic of reporting obligations and the use of the relevant reporting tools, including GISIS.

**Proposed target completion date: 1 October 2027.**

#### **Root cause**

**The following led to the finding:**

- .1 lack of a documented procedure for the systematic identification, assignment and communication of mandatory information to IMO, including legislation and certificate models;**
- .2 responsibilities were dispersed and not clearly defined; and**
- .3 lack of awareness and internal capacity to organize communication to IMO, including insufficient guidance and limited understanding of maritime governance, legal obligations and the use of reporting tools such as GISIS.**

#### **7.28 Observations**

None.

#### **8 Flag State activities**

8.1 The Ministry of Transport and Communications (MINTC) was primarily responsible for establishing flag State policies, while its agency, Finnish Transport and Communications Agency (Traficom), carried out most of the flag State functions. Several other government ministries and agencies also contributed to flag State implementation and enforcement tasks.

8.2 Within Traficom, the main departments assigned the primary responsibilities for flag State functions were the Department for Maritime Safety and Marine Environment and the Department for Seafarers and Boating.

8.3 The Safety Investigation Authority of Finland (SIAF) under the Ministry of Justice (MOJ) was responsible for all safety investigations, including those in the maritime sector. The Regional State Administrative Agencies (AVI) acted as regional authorities for occupational health and safety, including the investigation of maritime occupational accidents.

8.4 The Ministry of Education and Culture (MOEC) was responsible for seafarer education and training.

8.5 Finland's fleet included about 670 ships, consisting of passenger, cargo and fishing vessels operating in both domestic and international trade.

#### **Implementation**

8.6 The mandatory IMO instruments had been transposed into national legislation which applied even when the ships were outside Finnish waters. The responsibilities for

implementation were clearly defined and documented. The legislation also provided for stricter requirements under MARPOL, Finland being a part of the Baltic Sea Special area.

8.7 The Administration had issued administrative instructions and guidance for implementing the mandatory IMO instruments and national legislation. Guidance notes and interpretations were published through the website of Traficom and internal instructions and processes were documented in their QMS. Survey and certification processes in the Administration were managed through “Purkki” and “Portti” databases. Additional instructions to implement the mandatory IMO instruments had been issued to recognized organizations (ROs) as a part of the agreements.

8.8 The statutory certificates for ships on international voyages were issued by ROs, and these were required to be checked by the Administration during flag State inspections.

8.9 Reports on independent evaluation under regulation I/8 of STCW 1978 were sent to IMO regularly, and the latest report was sent on 14 October 2022. The Administration recognized certificates of competencies (CoCs) issued by 27 European Union member States and seven other parties under regulation I/10 of STCW 1978, and the details had been sent to IMO. The equivalent educational and training arrangements adopted by the Administration pursuant to Article IX of STCW 1978 had been sent to IMO on 27 September 2022. A list of dispensations granted from the requirements of STCW 1978 was also sent to IMO annually, and the last report before the audit was sent on 26 February 2024.

8.10 The Administration had established measures to enforce the requirements in respect of fatigue prevention and prevention of drug and alcohol abuse. The watchkeeping arrangements and principles to be observed as per regulation VIII/2 of STCW 1978 were implemented.

8.11 Any casualty, incident or deficiency on board a Finnish ship was required to be reported to Traficom (e.g. section 78 of the Maritime Act (674/1994)). A procedure for dealing with such reports by the Administration was implemented.

8.12 The Administration had developed guidance for those requirements “left to the satisfaction of the administration”, or equivalent contained in mandatory IMO instruments. A list of interpretations had been developed for SOLAS 1974 and a few other mandatory IMO instruments. This list, however, did not cater for all the areas in the mandatory IMO instruments, as the policy on this issue was not fully developed and documented. (See FD-2)

8.13 Safe manning of ships flying the flag of the State was regulated by the Act on the Ship's Crew and Safety Management of Ships (1687/2009). The manning scale based on the size of ship, registered power and trading area was prescribed. Furthermore, internal procedures had been established for issuance of minimum safe manning documents that reflected the *Principles of Minimum Safe Manning* (resolution A.1047(27)).

8.14 The Administration had established a system, under the Act on Electronic Communications Services (917/2014), for regulating radio equipment on ships. In this regard, Traficom was empowered to approve radio equipment, allocate call signs and other identification numbers, and issue radio licenses and qualifications to operators. Traficom was also responsible for maritime radio frequency planning, coordination and frequency monitoring to detect violations.

## **Delegation of authority**

8.15 The legal basis for delegation of authority to ROs was provided in section 36 of the Act 1686/2009 for the purpose of survey and certification of ships.

8.16 The process for recognizing and authorizing ROs was documented based on the Act on Technical Safety and Safe Operation of Ships (1686/2009) and EU Directive 2009/15/EC. Membership of the International Association of Classification Societies (IACS) and recognition by European Union was mandatory for ROs.

8.17 Six ROs had been authorized by the Administration based on written agreements as per the RO Code. The division of responsibilities between the Administration and the RO were documented in the annex to the agreements. Special measures to be undertaken by the RO in case of an accident or port State intervention, as well as the specific instructions detailing actions to be followed by the RO in the event that a ship was found unseaworthy, were stipulated in the agreement. Reporting requirements to the Administration by ROs were also documented.

8.18 The RO agreements stated that the Administration retained the authority to approve interpretations, equivalencies and exemptions from the mandatory IMO instruments. Detailed instructions on the practical implementation of the responsibilities were attached with the RO agreements. The list of national interpretations and the available areas "left to the satisfaction of the Administration", or equivalent was made available through the website of Traficom.

8.19 The oversight of ROs was conducted through biennial audits, flag State inspections and biannual meetings. The performance of ROs was also monitored through external sources such as reports from port State authorities and regional bodies (e.g. reports from Paris Memorandum of Understanding on Port State Control (Paris MoU) and the European Maritime Safety Agency (EMSA)). Instructions for monitoring of the ROs were documented and the records of oversight were maintained.

8.20 Nominated surveyors were appointed only for surveys of domestic cargo ships. Nominated surveyors were also appointed specifically for carrying out MARPOL Annex II cargo inspections. The monitoring and training of these surveyors were carried out annually.

## **Enforcement**

8.21 The Ship Safety Control Act (370/1995) empowered the flag State surveyors to carry out inspections on board ships and to detain ships when they were found deficient and unfit to proceed to sea. The Act also placed an obligation on ships to notify the flag and port States in case of deficiencies which affected the validity of the ship certificates.

8.22 When Traficom was made aware of any violations or suspected violations, they informed, Finnish Border Guard (FBG) and/or Police, who had the investigative powers to deal with the violations and initiate further penal proceedings in accordance with the law. Penal provisions were detailed in the Ship Safety Control Act (370/1995). Traficom had the authority to impose administrative sanctions. Administrative provisions were detailed in the Administrative Procedure Act (434/2003).

8.23 The Administration carried out flag State inspections with a view to verify compliance with the mandatory IMO instruments and to monitor the performance of their ROs. However, there was no policy or guidance available on the conduct of these inspections and a system for recording these inspections was still under development. (See FD-3)

8.24 The FBG used aircrafts, helicopters and satellite services for surveillance of sea area under the jurisdiction of the State for detection of violation of MARPOL. The criminal investigators of FBG dealt with the incidents of pollution and discharge violations. Administrative fines were applied to MARPOL Annex I violations and criminal sanctions could be applied to all MARPOL violations. Adequate personnel resources for enforcement were provided.

8.25 When a ship was detained under port State control (PSC), the company and RO were required to notify the Administration along with the details of deficiencies. It was evidenced that appropriate instructions were given to the RO to deal with the deficiencies and an internal procedure was in place to deal with such situations. A procedure for dealing with reports from port or coastal States was implemented.

### **Flag State surveyors**

8.26 The surveyors of Traficom had powers to carry out surveys/inspections under the Ship Safety Control Act (370/2019) and the Act on Technical Safety and Safe Operation of Ships (1686/2009). There were 21 flag State surveyors based in the field offices along the coast who carried out statutory surveys/inspections and PSC inspections.

8.27 In addition to the requirements for civil servants in Finland, the surveyors had to meet the minimum criteria prescribed in the III Code. At the time of the audit, the field surveyors in the Administration had a CoC as Master or a Chief Engineer.

8.28 The training requirements for flag State surveyors were documented, which covered the induction training and the in-service training. The training requirements for new and existing surveyors were in line with those of the Paris MoU. However, a system for qualification, training and updating of knowledge for other personnel involved in technical work related to mandatory IMO instruments was not evident. (See FD-4)

8.29 An identification document was provided for flag State surveyors which also detailed the powers and the reference to national legislation.

### **Evaluation and review**

8.30 The Administration evaluated the flag State performance as a part of the management review of the maritime administration using data on flag State surveys and inspections, PSC reports and casualty statistics. Records of flag State evaluation pertaining to 2023 and 2024 were provided.

### **Investigation of maritime accidents**

8.31 The SIAF, operating under MOJ and established under the Safety Investigation Act (525/2011), had the responsibility for investigation of accidents in all modes of transport and for carrying out these tasks independently and impartially. SIAF had five investigative branches, including a maritime branch.

8.32 The SIAF had issued orders and guidelines on the conduct of marine safety investigations. The Casualty Investigation Code had been included in the process through section 2(4) of the Act. It was prescribed that an investigation should be completed within a year of the incident. Section 14 of the Act covered impartiality and objectivity of the investigators.

8.33 The Safety investigation team consisted of three to five members and was always led by a full-time investigator from SIAF with relevant experts from a pool of about

120 investigators (of which about 30 had maritime expertise). Section 34 of the Act prescribed the competence of the investigation team, and a documented procedure was established for training of investigators through a modular approach.

8.34 The SIAF was transparent about their functions, and the status of investigation, final investigation reports and the recommendations were made available to public through their website. Investigation reports were communicated to IMO through the European Marine Casualty Information Platform (EMCIP) data system.

8.35 Any accident involving severe personal injury from occupational accidents and casualties on board ships were investigated under the Act 44/2006 by the Regional State Administrative Agencies under the Ministry of Social Affairs and Health. A report on the outcome of each of these investigations was produced and made available to the public on request. An annual report of the Occupational Safety and Health Administration was published online.

### **8.36 Findings (FDs)**

- .1 Although the Administration had developed a policy for those requirements that were “left to the satisfaction of the administration” or equivalent contained in the mandatory IMO instruments, it was evident that interpretations had not been developed or documented for some of such provisions under the mandatory IMO instruments (SOLAS 1974, regulation II-1/3-6.2.3; SOLAS 1974, regulation II-2/10.2.3.2.1; MARPOL, Annex I, regulation 14.3; III Code, paragraph 16.5). See Form A, FD-2**

#### **Corrective action**

**The maritime administration will implement the following actions:**

- .1 adopt and implement a formal policy for documenting and managing national interpretations, including criteria for recording, updating and referencing interpretive decisions related to IMO instruments. The policy will take into account examples of good practice, including those listed in the released by IMO Consolidated Audit Summary Reports (CASRs); and**
- .2 review and update the existing online list of national interpretations to enhance accessibility and traceability. A reference to national legislation (e.g. Finlex) will be included where the interpretation has been legally transposed.**

**Proposed target completion date: 1 October 2027.**

#### **Root cause**

**The following factors led to the finding:**

- .1 absence of formal policy or procedure in place for documenting and managing interpretations of provisions in mandatory IMO instruments that are left “to the satisfaction of the Administration”, or equivalent ; and**

- .2 lack of a centralized and structured approach to compiling, publishing and updating national interpretations, resulting in limited accessibility and traceability of previous decisions.**

**FD**

- .2 There was no evidence of a methodology for carrying out periodic inspections of the ships flying the flag of the State to verify that the actual condition of the ship and her crew were in conformity with the certificates it carried (III Code, paragraph 22.2). See Form A, FD-3**

**Corrective action**

**The maritime administration will implement the following actions:**

- .1 establish a systematic flag State inspection process to ensure the consistent planning, conduct and follow-up of inspections in accordance with the requirements of the III Code and the mandatory IMO instruments;**
- .2 adapt or enhance a national information system, as appropriate, to support the planning, conduct and documentation of flag State inspections, including access to relevant data and inspection records; and**
- .3 amend the Ship Safety Control Act to include provisions on flag State inspections, including their objectives and scope, and to explicitly reference the administering authority's international obligations under the mandatory IMO instruments.**

**Proposed target completion date: 1 October 2027.**

**Root cause**

**The following factors led to the finding:**

- .1 lack of a documented procedure and planning framework for flag State inspections, due to the perception that existing control measures were sufficient to meet international obligations; and**
- .2 responsibilities under the III Code were not fully transposed into national legislation, and the legal framework did not adequately reflect the mandatory nature of flag State inspection obligations under IMO instruments.**

**FD**

- .3 The Administration had not established a documented system for qualification and continuous updating of the knowledge for the personnel assisting in the performance of the work of surveyors/inspectors (III Code, paragraph 33; III Code, paragraph 35). See Form A, FD-4**

## **Corrective action**

**The maritime administration will implement the following actions:**

- .1 document competence management as a dedicated chapter in the Agency's (Traficom) quality management system, including requirements applicable to personnel supporting survey and inspection functions;**
- .2 document position-specific responsibilities and qualification criteria in the human resources system, and define and maintain task-specific requirements for support personnel in the quality management system; and**
- .3 amend the Ship Safety Control Act to include provisions on maintaining the competence of officials involved in the implementation and enforcement of applicable IMO instruments.**

**Proposed target completion date: 1 October 2027.**

## **Root cause**

**The following factors led to the finding:**

- .1 lack of a documented system for managing the competence of personnel supporting the work of surveyors and inspectors, including qualification criteria, training records, and defined responsibilities; and**
- .2 there was no structured approach to assess, maintain and develop the competence of support personnel beyond initial recruitment, and no formal mechanism for continuous professional development.**

## **8.37 Observations**

None.

## **9 Coastal State activities**

### **Implementation**

9.1 The Ministry of Transport and Communications (MINTC) was primarily responsible for the coastal State functions, supported by Finnish Transport and Communications Agency (Traficom), Finnish Meteorological Institute (FMI), Finnish Border Guard (FBG), Fintraffic Vessel Traffic Services Ltd. (Fintraffic VTS), Finnish Transport Infrastructure Agency (FTIA) and Finnish Environment Institute (FEI).

9.2 The policies for coastal State activities were developed by MINTC and the responsibilities of various entities for implementation and enforcement of the mandatory IMO instruments were assigned.

## **Radiocommunication services**

9.3 The Traficom was responsible for providing radiocommunication services and broadcasting navigational warnings as per section 24 of the Maritime Search and Rescue Act (1145/2001). These services were provided through a service agreement with Fintraffic VTS. The maritime safety information was transmitted to ships by Turku Radio (the national coastal radio station) on behalf of Fintraffic VTS. FBG was responsible for radiocommunications in emergency situations and the maintenance of the related preparedness as per section 24 of the Maritime Search and Rescue (SAR) Act (1145/2001).

9.4 Two weather reports, two ice reports and six weather warnings were broadcast to ships every day through 17 VHF base stations by Turku Radio, and also by NAVTEX through an arrangement with Sweden. Fintraffic VTS had an operational manual that covered the provision of radiocommunication services.

## **Meteorological services and warnings**

9.5 The FMI, an agency under MINTC, established in 1838, provided weather, sea and ice forecast for maritime needs as required by the Act on the FMI (212/2018). The responsibilities of FMI were also stated in the SAR Act (1145/2001) and Safety Investigation Act (525/2011).

9.6 The FMI maintained a coastal observation network, and prepared weather and marine analyses, forecasts and warnings based on the World Meteorological Organization's (WMO) guidelines. FMI had necessary infrastructure such as coastal weather stations, weather radars and sea ice observing stations to gather meteorological data. FMI, in collaboration with the FEI, had a Ferrybox system with instruments installed on five ships to report real-time observations from sea, under the Finnish Marine Research Infrastructure program. FMI also cooperated with FBG to report weather and ocean observations through their ships at sea. FMI had atmospheric and metocean forecasting models and had access to global weather model data to forecast weather.

9.7 The meteorological information and warnings were disseminated through the website of FMI, radio broadcasts at least twice a day (by Turku Radio through an agreement), VHF (by Fintraffic VTS) and NAVTEX (by an agreement with Sweden). FMI maintained ice observation service in the Baltic Sea and provided an Arctic daily observation ice-service webpage "Arctic now".

## **Search and rescue (SAR) services**

9.8 The FBG was responsible for the planning, development, coordination and supervision of maritime SAR services, under the Maritime Search and Rescue Act (1145/2001) and the Government Decree on Maritime Search and Rescue (37/2002). These provisions were supplemented by a "Maritime SAR Manual", "National Administrative Maritime Mass Rescue Plan (MoMeVa)" and "Regional Mass Rescue Plan".

9.9 In addition, FBG provided maritime assistance services, emergency maritime radiocommunication services and telemedical maritime assistance services for ships. A "Maritime SAR Coordination Committee" consisting of all stakeholders mentioned in Maritime Search and Rescue Act (1145/2001) assisted FBG in planning, developing and monitoring SAR services.

9.10 Maritime SAR assignments were managed by the maritime rescue coordination centre (MRCC) at Turku and a maritime rescue sub-centre (MRSC) at Helsinki, which operated round the clock. FBG had bilateral SAR arrangements with three neighbouring States and

multilateral SAR agreements for Arctic waters with nine States. FBG had 61 watercrafts of different sizes and nine air assets for SAR operations. High level of SAR preparedness was maintained by FBG through regular exercises; for example, 40 national exercises, six international exercises and 264 internal unit-level exercises were conducted in 2024.

9.11 SAR cooperation plans with passenger ships operating in the area were being reviewed in cooperation with Traficom, and the plans were stored in electronic and hardcopy forms at MRCC and MRSC. About five to 10 SAR exercises were held every year with the passenger ships and shipping companies.

### **Hydrographic services**

9.12 Traficom had the responsibility for providing hydrographic services under the Act on the Finnish Transport and Communications Agency (935/2018). Within Traficom, the hydrographic services were provided by the Finnish Hydrographic Office (FHO).

9.13 The FHO prepared their annual national hydrographic survey plans based on a common plan for the Baltic Sea developed in coordination with the States in the region. The common plan was reviewed every year and was updated based on the changes to the ships traffic and the needs of commercial shipping in the region.

9.14 The FHO had established processes, responsibilities and work instructions for hydrography through an internal quality management system (QMS). The hydrographic surveys were arranged through commercial service providers that fulfil prescribed standards. FHO maintained the hydrographic data in electronic form and produced nautical publications. FHO had 56 specialist staff on hydrography and eight external experts to provide the services. Records showed that nautical charts have been published for all offshore passages, coastal passages and approaches in the State.

9.15 The FHO issued printed nautical charts and electronic navigational charts (ENC) and they were distributed through the Regional ENC Coordinating Centre PRIMAR channels. Other nautical publications were distributed via Traficom website, which included download service and online web-service. Coastal warnings, if any, were broadcast by Sweden through NAVTEX on the basis of an agreement.

9.16 The State was a member of the International Hydrographic Organization (IHO) as well as regional hydrographic commissions. At the time of the audit, traficom was in the process of introducing a new reference system N2000 (Baltic Sea Chart Datum 2000) for nautical charts and fairways.

### **Ships' routeing, ship reporting systems and vessel traffic services (VTS)**

9.17 Traficom was the competent authority for VTS, traffic separation schemes (TSSs), ship routeing and ship reporting systems under the VTS Act (623/2005) and the Government Decree on VTS (93/2024). FTIA was the responsible entity for arranging VTS. Operational services were provided by Fintraffic VTS through a procurement agreement with FTIA.

9.18 VTS was provided through two centres of Fintraffic VTS, located in Turku and Helsinki that operated round the clock. There were seven TSSs adopted by IMO, which were monitored by Fintraffic VTS.

9.19 A mandatory ship reporting system had also been established covering the entire Gulf of Finland (GOFREP), with the exception of the national VTS areas, and shore-based facilities to support GOFREP had been established. As per section 19 of the Act, an operational manual had been established for providing VTS and ship reporting services. In accordance with

regulation V/11.11 of SOLAS 1974, GOFREP was reviewed in 2016, and the evaluation was reported by Finland to IMO (MSC 98/INF.11).

9.20 Fintraffic VTS had a certified QMS and a procedure was in place for training of VTS personnel. The qualification and training of VTS operators were prescribed in Government Decree on VTS (763/2005) and the records of their training were being maintained.

### **Aids to navigation (AtoN)**

9.21 Traficom was responsible for functions related to AtoN in the State based on the Act on the Finnish Transport and Communications Agency (935/2018) and the Water Traffic Act (728/2019). FTIA was responsible for the maintenance and management of AtoN information resources and the AIS-AtoN was provided by Fintraffic VTS through an agreement.

9.22 There were approximately 35,000 AtoN in Finland, of which approximately 26,000 were maintained by FTIA. A national guideline, "Maintenance of public waterways", provided guidelines for maintenance of AtoN. All AtoN maintenance was outsourced through five-year contracts and was supervised by FTIA.

9.23 The FTIA assessed AtoN through continuous collaboration with pilots and other fairway users and a remote monitoring system for AtoN was also in place. The condition and correct location of AtoN were checked every year after the winter (ice) season. The establishment of new AtoN or the modification or removal of an existing one was based on this assessment, and the changes were displayed on the nautical charts and announced in the Notices to Mariners. In addition, a survey on fairways, AtoN and VTS services was carried out every four years by consulting stakeholders.

### **Oil spill response**

9.24 The measures for oil and hazardous and noxious substances (HNS) spill response were based on the Rescue Act (379/2011). FBG was responsible for dealing with oil and HNS spills from ships at sea. The regional Rescue Department dealt with spills on the coastal waters and on the shore. The surveillance of oil pollution from ships was carried out by FBG through analysis of satellite images as well as through aircrafts of FBG.

9.25 The FBG had two aircrafts and 13 response vessels to respond to spills. In addition, FBG had 60 boats and had access to 400 boats from the regional Rescue Departments. The State had a tiered national spill response contingency plan. The inventory of assets was maintained and was accessible through a web portal.

9.26 Oil and HNS spill response drills were carried out with neighbouring States every year and additional national exercises were carried out by FBG as well as by the regional Rescue Departments. The State had a policy on the use of dispersants to combat pollution.

### **Enforcement**

9.27 Compliance with COLREG 1972 was monitored by Fintraffic VTS and all violations were reported to Traficom for further action. Section 120 of the Water Traffic Act prescribed offences and penalties in relation to AtoN, and it was mandatory to report non-functional or missing AtoN. Any AtoN installed without permits could be subjected to penalties.

9.28 A control and monitoring system monitored the violations and the statistics. Statistics and trend analysis on pollution incidents as well as pollution detections were maintained by FBG.

9.29 The Act on Environmental Protection in Maritime Transport (1672/2009) set out prohibitions and restrictions on discharges from ships, and violations were subject to penalties in accordance with the Criminal Code (39/1889). In addition, the Act provided for infractions which were punishable by a fine or for an administrative oil discharge fee.

### **Evaluation and review**

9.30 The performance as a coastal State was evaluated as part of the annual review of the maritime administration. In the review, each entity reported on its own activities for the annual review. Records of annual review of coastal State functions were provided.

9.31 The FMI performance was monitored through performance indicators such as marine wind forecast accuracy, service delivery rate, weather forecast accuracy and forecast lead-time. The performance objectives of FBG were set by the Ministry of Interior every year and the achievement of targets were monitored through a performance management system and reported through an annual report. Performance of the hydrographic services was evaluated through an internal QMS. Traficom had a management system to monitor the performance of AtoN services based on IALA recommendations.

### **9.32 Findings**

None.

### **9.33 Observations**

None.

## **10 Port State activities**

10.1 The Ministry of Transport and Communications (MINTC) was primarily responsible for the port State functions, supported by Finnish Transport and Communications Agency (Traficom) and Centre for Economic Development, Transport and the Environment (ELY centres). The policies for port State activities were developed by Traficom.

10.2 Traficom was responsible for port State control, regulating fuel oil supply to ships and carriage of cargoes through ports in the State. ELY centres were responsible for approval and monitoring of the port reception facilities and waste management plans.

### **Port State control (PSC)**

10.3 The State exercised its right to conduct PSC inspections under the Ship Safety Control Act (370/1995) and the Decree on inspection of foreign ships in Finland (1241/2010). The PSC programme implemented by the State was consistent with the IMO resolution A.1185(33). The State was a member of Paris Memorandum of Understanding on Port State Control (Paris MoU) and the PSC manual of Paris MoU was used by the Port State Control Officers (PSCOs) for inspections.

10.4 Traficom was the competent authority for PSC and the inspections were carried out its officers. PSCOs were bound by service conditions and government regulations (Civil Service Act) to ensure that there were no commercial interests in conducting PSC. The qualification and experience criteria of PSCOs were documented. They had to meet the national requirements set for civil servants, as well as the criteria specified in the PSC Directive of the European Parliament and of the Council on PSC. PSCOs were provided with induction training as well as periodic in-service training. The status of each PSCO was reviewed every five years on the basis of the inspections and training undertaken during the five-year period.

Training records were maintained and PSCOs had identity cards issued by the competent authority.

10.5 The State applied the “no more favourable treatment” principle to ships flying the flag of non-parties to the mandatory IMO instruments. Section 22, Chapter 6 of the Ship Safety Control Act provided for compensation in accordance with the Damages Act (412/1974) for any damage resulting from an error or neglect by the competent authority or undue delay.

### **Reception facilities**

10.6 The provision of port reception facilities (PRFs) was regulated through the Act on Environmental Protection in Maritime Transport (1672/2009). The Act required every port authority, oil terminal and ship repair yard to provide adequate facilities for waste reception. The facilities required in special areas were provided in the State and the waste collected was disposed as per local laws and approved waste management plans.

10.7 In the case of those ports that handled noxious liquid substances, surveyors were appointed to verify compliance with MARPOL, Annex II requirements. The information on PRFs in the State had been communicated to IMO.

### **Register of fuel oil suppliers**

10.8 Traficom was responsible for monitoring compliance with the quality of fuel oil supplied to ships, in accordance with MARPOL Annex VI. The supply of fuel oil to ships was regulated under sections 7 and 12 of the Act on Environmental Protection in Maritime Transport (1672/2009). The obligations of marine fuel suppliers were prescribed in section 11a of the Act, including maintenance of records as per MARPOL.

10.9 A register of suppliers of marine fuels was maintained by Traficom, and was available on its website.

### **Dangerous goods and grain loading**

10.10 The transport of dangerous goods was regulated through the Act on the Transport of Dangerous Goods (541/2023) and the Decree on the Transport of Dangerous Goods (925/2023). The Act prescribed mandatory training and qualifications for the personnel engaged in the transport of dangerous goods. The Radiation and Nuclear Safety Authority supervised the management of transport of radioactive material and compliance with the related requirements.

10.11 A system for verification of the training requirements of personnel engaged with the transport of dangerous goods was in place through an audit regime. Reports of these audits were maintained. Every port which handled more than 1,000 tons of dangerous goods per year had to have an emergency plan approved by Traficom, and the ports had to file a safety report every year in this regard. A system was in place for verification of placarding, labelling and packaging of dangerous goods.

10.12 With regard to the carriage of solid bulk cargoes, IMSBC Code was implemented through Decree 15/2015 and carriage of grain in bulk was regulated through section 76 of the Act on the Technical Safety and Safe Operation of Ships (1686/2009).

10.13 Verification of gross mass of containers (VGM) was implemented through the Maritime Act (674/1994) and Decree 387/2016, supplemented by the national guidelines for VGM issued by Traficom. A policy on VGM and packages was in place which required random checks to be carried out by the surveyors of Traficom.

## **Enforcement**

10.14 The Ship Safety Control Act (370/1995) had the provision to enforce the requirements of the mandatory IMO instruments on foreign ships in Finnish waters. This included powers to detain ships which were found to be unseaworthy and to report to relevant parties.

10.15 The Act on Environmental Protection in Maritime Transport (1672/2009) prescribed the enforcement provisions related to MARPOL, such as PRFs and fuel oil supply to ships. Penal provisions to deal with violation of VGM requirements were stated in the Maritime Act (674/1994).

## **Evaluation and review**

10.16 The performance in the conduct of port State activities was evaluated as part of the annual review of the maritime administration. In the review, each entity reported on its own activities for the annual review. Records of annual review of port State functions were provided.

10.17 The availability of reception facilities and waste management plans were reviewed periodically by ELY through inspections and five-yearly review of waste management plans. The monitoring of sulphur content in fuel oil was carried out by Customs.

10.18 With regard to dangerous goods, Traficom evaluated the performance through the annual safety reports submitted by the ports, audit of the ports every year and the regular inspections of transport and storage of dangerous goods in ports. Traficom also monitored the reports of alleged inadequacies of PRFs and non-compliant fuel based on reports from the flag State and the entries in GISIS.

## **10.19 Findings**

None.

## **10.20 Observations**

None.

## **11 Comments**

11.1 In order to ensure a consistent review of each Member State's activities falling within the III Code, all items from the verification index, which closely follows the requirements of the III Code, have been verified and the outcome provided in appendix 2 to this report.

## **Areas of positive development**

11.2 Areas of positive development include:

- .1 The State had a system to keep the national legislation up to date with the amendments to the mandatory IMO instruments. When the State anticipated that an amended IMO instrument may not be transposed into national law before its entry into force, the State had a procedure of registering an objection with IMO until the related national legislation is in place. Once the process for the national legislation was completed, the objection was withdrawn to bring the amendment into force in the State.

## Areas for further development

11.3 Areas for further development include:

- .1 Although the State had an overall strategy that covered all the entities in the maritime administration, there were several other policy and strategy documents both at a national level and within the entities related to maritime aspects. The State should consider harmonization between these policy and strategy documents and the “Policies on procedures for the promulgation of the mandatory instruments of the International Maritime Organization (IMO) and for ensuring the compliance of the maritime administration”.
- .2 The State had a policy of conducting random checks for detection of violation of the verification of gross mass of containers, which was implemented through the Traficom inspectors. The State should consider an increase in the number of random checks since the number of such checks were low in comparison to the number of containers handled by the ports in the State (approximately 400,000 containers were handled by ports all over the country every year).

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**APPENDIX 1**  
**FINDINGS AND OBSERVATIONS**  
**(Form A)**

<b>FINDINGS/OBSERVATIONS NOTICE</b>	
<b>Member State: Finland</b>  <b>Department: Traficom</b>	<b>Audit period:</b> <b>28 October 2024 to 4 November 2024</b>
<b>Finding No.: FD-1</b>	<b>Observation No.:</b>
<b>STATEMENT:</b>  <p style="text-align: center;">The State had not fulfilled its obligations regarding communication of information to IMO under the mandatory IMO instruments (e.g., specimen of certificates, information on text of laws/regulations)</p>	
<b>EVIDENCE:</b>  <p style="text-align: center;">As examples, specimen of certificates issued under SOLAS 1974, some of the text of laws/regulations were not communicated to IMO.</p>	
<b>APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:</b>  <b>SOLAS 1974, article III</b>  "Communication of information"  <b>III Code, paragraph 9</b>  "Communication of information - The State shall communicate its strategy, as referred to in paragraph 3, including information on its national legislation to all concerned"	
<b>Team leader: Prasad Panicker</b>	<b>Date: 4 November 2024</b>
<b>Member State: Finland</b>	<b>Date received:</b>

(Form A)

<b>FINDINGS/OBSERVATIONS NOTICE</b>	
<b>Member State: Finland</b> <b>Department: Traficom</b>	<b>Audit period:</b> 28 October 2024 to 4 November 2024
<b>Finding No.: FD-2</b>	<b>Observation No.:</b>
<b>STATEMENT:</b>  Although the Administration had developed a policy for those requirements that were “left to the satisfaction of the administration” contained in the mandatory IMO instruments, it was evident that interpretations had not been developed or documented for some of such provisions under the mandatory IMO instruments.	
<b>EVIDENCE:</b>  The requirements that were “left to the satisfaction of the administration” in MARPOL were not available (e.g. national requirements to be applied for ships below 150 GT/400GT as per MARPOL annex I, reg 6.2).	
<b>APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:</b>  MARPOL, Annex I, regulation 6  "Surveys"  III Code, paragraph 16.5  "The development, documentation and provision of guidance concerning those requirements found in the relevant international instruments that are to the satisfaction of the Administration"	
<b>Team leader: Prasad Panicker</b>	<b>Date: 4 November 2024</b>
<b>Member State: Finland</b>	<b>Date received:</b>

(Form A)

<b>FINDINGS/OBSERVATIONS NOTICE</b>	
<b>Member State: Finland</b> <b>Department: Traficom</b>	<b>Audit period:</b> 28 October 2024 to 4 November 2024
<b>Finding No.: FD-3</b>	<b>Observation No.:</b>
<b>STATEMENT:</b>  There was no evidence of a methodology for carrying out periodic inspections of the ships flying the flag of the State to verify that the actual condition of the ship and her crew were in conformity with the certificates she carried, and that the requirements of the mandatory IMO instruments were met.	
<b>EVIDENCE:</b>  A clear policy and guidance on carrying out flag State inspections was not available. A system of ship inspections including the reporting is under development.	
<b>APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:</b>  III Code, paragraph 22.2  "The periodic inspection of ships entitled to fly its flag to verify that the actual condition of the ship and its crew is in conformity with the certificates it carries"	
<b>Team leader: Prasad Panicker</b>	<b>Date: 4 November 2024</b>
<b>Member State: Finland</b>	<b>Date received:</b>

(Form A)

<b>FINDINGS/OBSERVATIONS NOTICE</b>	
<b>Member State: Finland</b> <b>Department: Traficom</b>	<b>Audit period:</b> 28 October 2024 to 4 November 2024
<b>Finding No.: FD-4</b>	<b>Observation No.:</b>
<b>STATEMENT:</b>  The Administration did not have a documented system for qualification and continuous updating of the knowledge for the personnel assisting in the performance of the work of surveyors/inspectors.	
<b>EVIDENCE:</b>  It was evident that a documented system for the qualification, training and continuous updating of the knowledge and maintenance of training records in relation to the personnel who assisted in the performance of the work of surveyors/inspectors in the Administration is yet to be established.	
<b>APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:</b>  <b>III Code, paragraph 33</b>  "Flag State surveyors - Other personnel assisting in the performance of such work shall have education, training and supervision commensurate with the tasks they are authorized to perform"  <b>III Code, paragraph 35</b>  "Flag State surveyors - The flag State shall implement a documented system for qualification of personnel and continuous updating of their knowledge as appropriate to the tasks they are authorized to undertake"	
<b>Team leader: Prasad Panicker</b>	<b>Date: 4 November 2024</b>
<b>Member State: Finland</b>	<b>Date received:</b>

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**APPENDIX 2**

**ASSESSMENT OF AREAS RELATED TO THE III CODE  
(VERIFICATION INDEX)**

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
<b>COMMON AREAS</b>		
<b>STRATEGY</b>		
3.1	An overall strategy exists to ensure that international obligations and responsibilities as a flag, port and coastal State are met	Y
3.2	Methodology established to monitor and assess that the strategy ensures effective implementation and enforcement of relevant international mandatory instruments; and	Y
3.3	Continuous review of the strategy undertaken to achieve, maintain and improve the overall organizational performance and capability as a flag, port and coastal State	Y
<b>GENERAL</b>		
4	Means in place to ensure compliance with relevant international rules and regulations in respect of maritime safety and protection of the marine environment	Y
4	National legislation exist to give effect to the provisions of relevant IMO instruments	Y
<b>INITIAL ACTIONS (NATIONAL LEGISLATION)</b>		
8	Capability to implement and enforce the provisions of the applicable IMO instruments through appropriate national legislation and to provide the necessary implementation and enforcement infrastructure	Y
8.1	Capability to promulgate laws which permit effective jurisdiction and control in administrative, technical and social matters over ships flying its flag	Y
8.2	A legal basis in place for the enforcement of national laws and regulations, including the associated investigative and penal processes	Y
8.3	Sufficient personnel with maritime expertise to assist in the promulgation of the necessary national laws and to discharge all the responsibilities of the State, including reporting as required by the respective conventions	Y
<b>COMMUNICATION</b>		
9	Strategy, including information on relevant national legislation, communicated to all concerned	See FD-1

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
<b>RECORDS</b>		
10	Records established and maintained	Y
10	Records are legible, readily identifiable and retrievable	Y
10	Documented procedure defining controls on identification, storage, protection, retrieval, retention time and disposition of records	Y
<b>IMPROVEMENT</b>		
11	Demonstrates continual improvement of measures giving effect to conventions and protocols accepted	Y
11	Improvement made through rigorous and effective application and enforcement of national legislation, as appropriate, and monitoring of compliance	Y
12	A culture exists providing opportunities to people for improvement of performance in maritime safety and environmental protection activities	Y
13	Action taken to identify and eliminate causes of any non-conformities in order to prevent recurrence	Y
13.1	Non-conformities reviewed and analysed	Y
13.2	Implementation of necessary corrective actions monitored	Y
13.3	Reviews of corrective actions taken	Y
<b>FLAG STATE SPECIFIC REQUIREMENTS</b>		
<b>IMPLEMENTATION</b>		
15.1	Policies implemented through national legislation and guidance	Y
15.2	Responsibilities within the Administration assigned to update and revise any relevant policies adopted	Y
16	Resources and processes capable of administering a safety and environmental protection programme in place	Y
16.1	Administrative instructions to implement applicable international rules and regulations issued	Y
16.2	Resources in place to ensure compliance with the requirements of IMO instruments, through an independent audit and inspection programme	Y
16.3	An audit and inspection programme independent of any administrative bodies is in place, for requirements of STCW 1978, as amended	-
16.3	Training, assessment of competence and certification of seafarers are in accordance with the provisions of STCW 1978	-
16.3.2	STCW certificates and endorsements accurately reflect the competencies of the seafarers, using the appropriate terminology	-
16.3.3	Impartial investigation capabilities ensured	-

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
16.3.4	Ability exists for certificates or endorsements to be effectively withdrawn, suspended or cancelled	-
16.4	Resources in place to ensure the conduct of investigations into casualties and adequate and timely handling of cases of ships with identified deficiencies	Y
16.5	Resources in place to develop, document and provide guidance of requirements found in relevant mandatory IMO instruments	See FD-2
17	Ships entitled to fly the flag of the State are sufficiently and efficiently manned	Y
<b>DELEGATION OF AUTHORITY (as far as applicable)</b>		
18.1	The Administration determines that recognized organizations (ROs) have adequate resources	Y
18.2	Formal written agreements between the Administration and ROs in place	Y
18.3	Specific instructions issued to ROs detailing action to be followed when a ship is unfit to proceed to sea	Y
18.4	ROs provided with all appropriate instruments of national law and interpretations thereof	Y
18.5	ROs required to maintain records and give the Administration access to them	Y
20	An oversight programme established or participation in such a programme ensured, with adequate resources	Y
20.1	Authority exercised to conduct supplementary surveys	Y
20.2	Supplementary surveys conducted, as necessary	Y
20.3	Staff available with requisite knowledge to carry out effective oversight of ROs	Y
21	Nominations of surveyor(s) regulated, as appropriate	Y
<b>ENFORCEMENT</b>		
22	All necessary measures to secure observance of international rules and standards by ships entitled to fly the flag of the State and by entities and persons under its jurisdiction so as to ensure compliance with their international obligations	Y
22.1	Legal/administrative mechanism exist to prohibit ships from sailing for non-compliance	Y
22.2	Periodic inspection of ships entitled to fly the flag of the State to verify that the actual condition of the ship and its crew is in conformity with the certificates it carries	See FD-3
22.3.1	Surveyors ensure that seafarers assigned to the ships are familiar with their specific duties	Y
22.3.2	Surveyors ensure that seafarers assigned to the ships are familiar with ship arrangements, installations, equipment and procedures	Y

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
22.4	Surveyors ensuring that ship's complement, as a whole, can effectively coordinate their activities in an emergency situation and perform functions vital to safety or to the prevention or mitigation of pollution	Y
22.5	Penalties of adequate severity to discourage violation of international rules and standards exist in national laws and regulations	Y
22.6	Capability to institute proceedings – after an investigation has been conducted – against ships which have violated international rules and standards, irrespective of where the violation has occurred	Y
22.7	Penalties of adequate severity to discourage violations of international rules and standards by individuals issued with certificates or endorsements under their authority exist in national laws and regulations	Y
22.8	Capability to institute proceedings – after an investigation has been conducted – against individuals holding certificates or endorsements who have violated international rules and standards, irrespective of where the violation has occurred	Y
23	Control and monitoring programme developed and implemented	Y
23.1	Prompt and thorough casualty investigations, with reporting to IMO, provided	Y
23.2	Statistical data collected and trend analyses conducted	Y
23.3	Timely response to deficiencies and alleged pollution incidents reported by port or coastal States	Y
24.5	Training and oversight of the activities of flag State surveyors and investigators ensured	Y
25	Appropriate corrective measures to bring own ships into compliance with the applicable international conventions can be taken	Y
26	Provision for flag State or RO to determine international certificates only issued to ships meeting all applicable standards	Y
27	International certificate of competency or endorsement only issued after it has been determined that the person meets all applicable requirements	Y
<b>FLAG STATE SURVEYORS</b>		
28	Responsibilities, authority and interrelation of all personnel who manage, perform and verify work relating to and affecting safety and pollution prevention defined and documented	Y
29	Personnel responsible for, or performing surveys, inspections and audits on ships and companies covered by the relevant IMO mandatory instruments appropriately qualified	Y

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
32	Personnel have appropriate practical and theoretical knowledge of ships, their operation and the provisions of the relevant national and international instruments necessary to perform their duties as flag State surveyors obtained through documented training programmes	Y
33	Personnel assisting surveyors have education, training and supervision commensurate with the tasks they are authorized to perform	See FD-4
35	Documented system for qualification of personnel and continuous updating of their knowledge as appropriate to the tasks they are authorized to undertake	See FD-4
37	Identification document issued for the surveyor to carry when performing his/her tasks	Y
<b>FLAG STATE INVESTIGATIONS</b>		
38	Casualty investigations conducted by suitably qualified, impartial investigators, competent in matters relating to the casualty	Y
38	Qualified investigators provided, irrespective of the location of casualty or incident	Y
39	Individual investigators have working knowledge and practical experience in those subject areas pertaining to their normal duties	Y
39	State has ready access to expertise in listed areas: navigation and the Collision Regulations; flag State regulations on certificates of competency; causes of marine pollution; interviewing techniques; evidence gathering; and evaluation of the effects of the human element	Y
40	Any accidents involving personal injury necessitating absence from duty of three days or more and any deaths resulting from occupational accidents and casualties investigated, and the results of such investigations made public	Y
41	Ship casualties investigated and reported in accordance with the relevant IMO conventions, and the guidelines developed by IMO	Y
41	Investigation reports forwarded to IMO together with the flag State's observations	Y
<b>EVALUATION AND REVIEW</b>		
42	Performance evaluated with respect to the implementation of administrative processes, procedures and resources necessary to meet their obligations as required by the conventions to which they are party	Y

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
<b>COSTAL STATE SPECIFIC REQUIREMENTS</b>		
<b>IMPLEMENTATION</b>		
46.1	Policies implemented through issuance of national legislation and guidance	Y
46.2	Responsibilities assigned to update and revise any relevant policies adopted	Y
47	Legislation, guidance and procedures established for the consistent implementation and verification of the rights, obligations and responsibilities of the State contained in the relevant international instruments to which it is a party, in general;	Y
48.1	For radiocommunication services;	Y
48.2	For meteorological services and warnings;	Y
48.3	For search and rescue services;	Y
48.4	For hydrographic services;	Y
48.5	For ship routing;	Y
48.6	For ship reporting systems;	Y
48.7	For vessel traffic services; and	Y
48.8	For aids to navigation	Y
<b>ENFORCEMENT</b>		
49	All necessary measures taken to ensure observance of international rules when exercising the rights and fulfilling the obligations as a coastal State	Y
50	Control and monitoring programme considered, developed and implemented	Y
50.1	Statistical data collected and trend analyses conducted	Y
50.2	Mechanisms for timely response to pollution incidents established	Y
50.3	Cooperation with flag States and/or port States in investigation of maritime casualties	Y
<b>EVALUATION AND REVIEW</b>		
51	Performance periodically evaluated in respect of exercising its rights and meeting its obligations under the applicable international instruments	Y
<b>PORT STATE SPECIFIC REQUIREMENTS</b>		
<b>IMPLEMENTATION</b>		
54.1	Policies implemented through issuance of national legislation and guidance	Y
54.2	Responsibilities assigned to update and revise any relevant policies adopted	Y

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
55	Legislation, guidance and procedures established for the consistent implementation and verification of the rights, obligations and responsibilities of the State contained in the relevant international instruments to which it is a party, in general;	Y
56.1	For provision of appropriate reception facilities or capability to accept all waste streams regulated under the instruments of the Organization;	Y
56.2	For port State control activities; and	Y
56.3	For keeping a register of fuel oil suppliers	Y
<b>ENFORCEMENT</b>		
57	All necessary measures taken to ensure observance of international rules when exercising the rights and fulfilling the obligations as a port State	Y
59	No more favourable treatment put in place when carrying out port State control	Y
60	Processes to administer a port State control programme established consistent with the relevant resolution adopted by the Organization	Y
61	Port State control carried out only by authorized and qualified port State control officers in accordance with the relevant procedures adopted by the Organization	Y
62	Port State control officers and persons assisting them free from any commercial, financial and other pressures and have no commercial interest, either in the port of inspection or the ships inspected	Y
62	Port State control officers and persons assisting them not employed by or undertake work on behalf of recognized organizations or classification societies	Y
62	Procedures implemented to ensure that persons or organizations external to the port State cannot influence the results of port State inspection	Y
<b>EVALUATION AND REVIEW</b>		
63	Performance periodically evaluated in respect of exercising its rights and meeting its obligations under the applicable instruments of the Organization	Y

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**APPENDIX 3**  
**MEMBER STATE'S CORRECTIVE ACTION PLAN**  
**FORM B**

CORRECTIVE ACTION			
<b>Member State:</b>	Finland	<b>Audit Period:</b>	28 October to 4 November 2024
<b>Department:</b>	Traficom	<b>Team leader:</b>	Prasad Panicker
<b>Finding No.:</b>	FD-1	<b>Observation No.:</b>	

**Root Cause(s):**

The following led to the finding:

- .1 lack of a documented procedure for the systematic identification, assignment and communication of mandatory information to IMO, including legislation and certificate models;
- .2 responsibilities were dispersed and not clearly defined; and
- .3 lack of awareness and internal capacity to organize communication to IMO, including insufficient guidance and limited understanding of maritime governance, legal obligations and the use of reporting tools such as GISIS.

**Corrective action:**

The maritime administration will implement the following actions:

- .1 develop a reporting manual for the maritime administration, including a GISIS user manual, documenting the tasks for each organisation, taking IMO resolution A.1139(31) on communication of info to IMO into consideration;
- .2 require each responsible entity to review the register of obligations stemming from the mandatory IMO instruments, identify the reporting and communication responsibilities falling within its remit, and assess their transposition into national legislation; and
- .3 produce introductory familiarization material for public administration personnel to raise awareness of maritime governance, responsibilities under IMO instruments, applicable national legislation, building on the materials prepared for the audit. The GISIS contact point list will also be updated, with the understanding that the person designated therein will act, for each entity, as the designated person who understands the basic of reporting obligations and the use of the relevant reporting tools, including GISIS.

**Proposed target completion date:** 1 October 2027

**Action Plan Submitted:**

By Hanna Suutarla (SPC) On 16 December 2025  
(name)

<p><b>To:</b> Audit Team Leader. <u>Prasad Panicker</u>  <small>(name)</small></p> <p><input checked="" type="checkbox"/> For review: <u>[Signature]</u> <u>9/6/2026</u>  <small>(signature) (date)</small></p>	<p>IMO Secretariat <u>Omar Hassein</u>  <small>(name)</small></p> <p><input type="checkbox"/> For information: <u>[Signature]</u> <u>9 June 2026</u>  <small>(signature) (date)</small></p>
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Copies to :

**FORM B**

CORRECTIVE ACTION			
<b>Member State:</b>	Finland	<b>Audit Period:</b>	28 October to 4 November 2024
<b>Department:</b>	Traficom	<b>Team leader:</b>	Prasad Panicker
<b>Finding No.:</b>	FD-2	<b>Observation No.:</b>	

**Root Cause(s):**

The following factors led to the finding:

- .1 absence of formal policy or procedure in place for documenting and managing interpretations of provisions in mandatory IMO instruments that are left "to the satisfaction of the Administration", or equivalent ; and
- .2 lack of a centralized and structured approach to compiling, publishing and updating national interpretations, resulting in limited accessibility and traceability of previous decisions.

**Corrective action:**

The maritime administration will implement the following actions:

- .1 adopt and implement a formal policy for documenting and managing national interpretations, including criteria for recording, updating and referencing interpretive decisions related to IMO instruments. The policy will take into account examples of good practice, including those listed in the released by IMO Consolidated Audit Summary Reports (CASRs); and
- .2 review and update the existing online list of national interpretations to enhance accessibility and traceability. A reference to national legislation (e.g. Finlex) will be included where the interpretation has been legally transposed.

**Proposed target completion date:** 1 October 2027

**Action Plan Submitted:**

B By Hanna Suutarla (SPC) On 16 December 2025  
(name)

<b>To:</b> Audit Team Leader. <u>Prasad Panicker</u> (name)	IMO Secretariat	<u>Omar Hassein</u> (name)
<input checked="" type="checkbox"/> For review: <u>[Signature]</u> (signature)	<input type="checkbox"/> For information: <u>[Signature]</u> (signature)	<u>9 June 2026</u> (date)
<u>9/6/2026</u> (date)		

Copies to :

**FORM B**

CORRECTIVE ACTION			
<b>Member State:</b>	Finland	<b>Audit Period:</b>	28 October to 4 November 2024
<b>Department:</b>	Traficom	<b>Team leader:</b>	Prasad Panicker
<b>Finding No.:</b>	FD-3	<b>Observation No.:</b>	

**Root Cause(s):**

The following factors led to the finding:

- .1 lack of a documented procedure and planning framework for flag State inspections, due to the perception that existing control measures were sufficient to meet international obligations; and
- .2 responsibilities under the III Code were not fully transposed into national legislation, and the legal framework did not adequately reflect the mandatory nature of flag State inspection obligations under IMO instruments.


**Corrective action:**



The maritime administration will implement the following actions:

- .1 establish a systematic flag State inspection process to ensure the consistent planning, conduct and follow-up of inspections in accordance with the requirements of the III Code and the mandatory IMO instruments;
- .2 adapt or enhance a national information system, as appropriate, to support the planning, conduct and documentation of flag State inspections, including access to relevant data and inspection records; and
- .3 amend the Ship Safety Control Act to include provisions on flag State inspections, including their objectives and scope, and to explicitly reference the administering authority's international obligations under the mandatory IMO instruments.

**Proposed target completion date:** 1 October 2027

**Action Plan Submitted:**

B By  On 16 December 2025  
 Hanna Suutarla (SPC) (name)

<b>To: Audit Team Leader.</b> <u>Prasad Panicker</u> (name)	<b>IMO Secretariat</b>	<u>Omar Hassein</u> (name)
<input checked="" type="checkbox"/> <b>For review:</b> <u></u> <u>9/6/2028</u> (signature) (date)	<input type="checkbox"/> <b>For information:</b> <u></u>	<u>9 June 2026</u> (date)

Copies to :

**FORM B**

CORRECTIVE ACTION			
<b>Member State:</b>	Finland	<b>Audit Period:</b>	28 October to 4 November 2024
<b>Department:</b>	Traficom	<b>Team leader:</b>	Prasad Panicker
<b>Finding No.:</b>	FD-4	<b>Observation No.:</b>	

**Root Cause(s):**

The following factors led to the finding:

- .1 lack of a documented system for managing the competence of personnel supporting the work of surveyors and inspectors, including qualification criteria, training records, and defined responsibilities; and
- .2 there was no structured approach to assess, maintain and develop the competence of support personnel beyond initial recruitment, and no formal mechanism for continuous professional development.


**Corrective action:**



The maritime administration will implement the following actions:

- .1 document competence management as a dedicated chapter in the Agency's (Traficom) quality management system, including requirements applicable to personnel supporting survey and inspection functions;
- .2 document position-specific responsibilities and qualification criteria in the human resources system, and define and maintain task-specific requirements for support personnel in the quality management system; and
- .3 amend the Ship Safety Control Act to include provisions on maintaining the competence of officials involved in the implementation and enforcement of applicable IMO instruments.

**Proposed target completion date:** 1 October 2027

**Action Plan Submitted:**

B By  Hanna Suutarla (SPC) On 16 December 2025  
 (name)

To: Audit Team Leader. <u>Prasad Panicker</u> (name)	IMO Secretariat	<u>Omar Hassein</u> (name)
<input checked="" type="checkbox"/> For review: <u></u> (signature)	<input type="checkbox"/> For information: <u></u> (signature)	<u>9 June 2026</u> (date)
<u>9/6/2026</u> (date)		

Copies to :

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**ANNEX 1  
AUDIT PROGRAMME**

Day 1 Monday (28 October 2024)					
Time (1)	Activity (2)	Participants (3)	Division and Location (4)		
0930-1015 (Session 1)	<b>Opening meeting</b> <b>Introduction of auditors &amp; audit</b> <b>The opening words by Ms. Laura Eiro, followed by a short</b> introduction round of the participating organisations (total 15 min). The intro of audit team, ATL presentation approx. 15 mins,	<b>All auditors</b>  <b>Member State representatives/bodies</b>	<b>Ministry of Environment</b> Aleksanterinkatu 7 <u>Pankkisali</u> (08:00-12:00).		
				MINTC	<b>Laura Eiro, Anne Miettinen</b> (ses.3), Katja Viertävä, Laura Sarlin, Paula Rinne, <b>Saara Reinimäki</b> (ses.2)
				Traficom	<b>Jarkko Saarimäki</b> , Juha-Matti Korsi, Hanna Suutarla, <b>Sanna Sonninen</b> , Susanna Jansson
				ELY	<b>Jenni Ojala</b> , Suvi Hjorth
				MOEC	<b>Petri Lempinen +</b> Minna Balint, Katri Tervaspalo
				MOSAH	<b>Arto Teronen + Noora Pajukoski</b>
				Fintraffic	<b>Sari Talja</b>
				MOE	Saara Bäck, Eeva-Maija Puheloinen

Day 1 Monday (28 October 2024)				
Time (1)	Activity (2)	Participants (3)		Division and Location (4)
		The Finnish Border Guard	<b>Juha Vuolle</b> , Sami Järvenpää, Eeva Havas, Heli Haapasaari	
		OTKES	Kurt Kokko, Suvi Jokinen, Risto Haimila, Ilkka Kervinen, Tiina Bieber	
		FTIA	<b>Jarkko Toivola</b> , Elisa Mikkolainen, Joonatan Ahlroos	
		ESAVI	Frans Lähdesmäki, Teemu Lukkari	
		Syke	<b>Mika Raateoja</b> , Tommi Kontto	
		PMO	Jussi Soramäki	
		MOI	<b>Ville Estlander</b>	
		FMI	Juhana Hyrkkänen, Patrick Eriksson, Sanna Mäkinen	
<b>1015-1045 (Session 2)</b>	<b>Member State Presentation</b> <ul style="list-style-type: none"> <li>Structure of the maritime administration - Entities and other agencies involved in the implementation and enforcement of relevant IMO instruments</li> <li>Division of responsibilities among entities involved in implementation and enforcement</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b> Attendees as presented above.		<b>Ministry of Environment</b> Aleksanterinkatu 7 <u>Pankkisali</u> (08:00-12:00).
<b>1045-1130 (Session 3)</b>	<b>Common areas - Strategy</b> <ul style="list-style-type: none"> <li>Overall maritime policy and strategy of the State</li> <li>Linkage of entities to overall maritime strategy</li> <li>Overall coordination and communication of strategy</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b> Attendees as presented above.		<b>Ministry of Environment</b> Aleksanterinkatu 7 <u>Pankkisali</u>

Day 1 Monday (28 October 2024)							
Time (1)	Activity (2)	Participants (3)	Division and Location (4)				
	<ul style="list-style-type: none"> <li>Performance measurement and continual review for improvement of overall organisational performance</li> </ul>		(08:00-12:00).				
11:30-12:30	Lunch break	All auditors	RAVINTOLA BANK Unioninkatu 20, 00130 Helsinki				
	and transit by walking (total 600 m)						
12:30 - 14:00 (Session 4)	<p><b>Common areas - Legislation Processes</b></p> <ul style="list-style-type: none"> <li>Legal system and hierarchy of legislation (Overall), the process for the integration of IMO mandatory instruments and their amendments into national law</li> <li>How is a treaty ratified/promulgated/implemented and enforced? (e.g. SOLAS)</li> <li>Relevant principal legislations under various ministries (SOLAS, MARPOL, LL, etc.)</li> <li>Primary and subordinate legislation (Acts, regulations, circulars, policies and officially published guidance)</li> <li>General enforcement procedures and arrangements in legislation</li> <li>Review of legislation, and amendment policies</li> <li>Review of legislation, interpretations, and guidance notes</li> </ul>	<p>All auditors</p> <p>Member State representatives/bodies</p> <table border="1"> <tr> <td>MINTC</td> <td>Katja Viertävä, Laura Sarlin</td> </tr> <tr> <td>Traficom</td> <td>Matti Mämmi, (Hanna Suutarla), Aleksi Uttula, J-M Korsi</td> </tr> </table>	MINTC	Katja Viertävä, Laura Sarlin	Traficom	Matti Mämmi, (Hanna Suutarla), Aleksi Uttula, J-M Korsi	<p>Location: <b>Ministry of Transport and Communications</b> Eteläesplanadi 4, Helsinki <u>Espa 4</u> (<u>booking:</u> 11:30-19:00)</p>
MINTC	Katja Viertävä, Laura Sarlin						
Traficom	Matti Mämmi, (Hanna Suutarla), Aleksi Uttula, J-M Korsi						
14:00- 14:15	Coffee						
14:15-15:15 (Session 5)	<p><b>Common areas</b></p> <p><b>Records</b></p> <p><b>Communication of information to IMO</b></p> <ul style="list-style-type: none"> <li>Mechanism of communication and coordination within the maritime administration</li> </ul>	<p>All auditors</p> <p>Member State representatives/bodies</p>	<p><b>Ministry of Transport and Communications</b> <u>Espa 4</u> (<u>booking:</u> 11:30-19:00)</p>				

Day 1 Monday (28 October 2024)							
Time (1)	Activity (2)	Participants (3)	Division and Location (4)				
	<p><b>Improvement</b></p> <ul style="list-style-type: none"> <li>Maritime culture (continual training programme, national and regional drills, reward and incentive mechanism)</li> <li>Control measures (Evaluation, review and improvement measures)</li> </ul>	<table border="1"> <tr> <td>MINTC</td> <td>Miettinen Anne, Tervonen Juha (incentives), Jani Haapsaari; (teams: Katja Viertävä, Sarlin Laura)</td> </tr> <tr> <td>Traficom</td> <td>Korsi Juha, Uttula Aleks, Suutarla Hanna  [Salo Maija (data)(teams), Nykyri Satu (registers) (teams)]</td> </tr> </table>	MINTC	Miettinen Anne, Tervonen Juha (incentives), Jani Haapsaari; (teams: Katja Viertävä, Sarlin Laura)	Traficom	Korsi Juha, Uttula Aleks, Suutarla Hanna  [Salo Maija (data)(teams), Nykyri Satu (registers) (teams)]	
MINTC	Miettinen Anne, Tervonen Juha (incentives), Jani Haapsaari; (teams: Katja Viertävä, Sarlin Laura)						
Traficom	Korsi Juha, Uttula Aleks, Suutarla Hanna  [Salo Maija (data)(teams), Nykyri Satu (registers) (teams)]						
1515 – 1715 (Session 6)	<p><b>SOLAS</b></p> <ul style="list-style-type: none"> <li>Review of policies for the implementation and enforcement of SOLAS including mandatory Codes (e.g., IMDG)</li> <li>Legislation, design and construction, stability and equipment approval</li> <li>Implementation and enforcement of SOLAS</li> <li>Survey and certification</li> <li>Exemptions, dispensations etc.</li> <li>Control measures, review and improvement</li> <li>Interpretations left to the “satisfaction of the Administration”</li> <li>Safe manning of ships entitled to fly flag of State</li> <li>Reporting to IMO</li> </ul>	<p><b>All auditors</b></p> <p><b>Member State representatives/bodies</b></p> <table border="1"> <tr> <td>Traficom</td> <td>Jyrki Vähätalo, Toni Karppinen, Aleks Uttula, Irina Laine, Santeri Lunkka, Sten Sundberg, Tuomas Kokoi, [Hanna Suutarla -SPC]</td> </tr> <tr> <td>MINTC</td> <td>Katja Viertävä</td> </tr> </table>	Traficom	Jyrki Vähätalo, Toni Karppinen, Aleks Uttula, Irina Laine, Santeri Lunkka, Sten Sundberg, Tuomas Kokoi, [Hanna Suutarla -SPC]	MINTC	Katja Viertävä	<p><b>Ministry of Transport and Communications</b> Eteläesplanadi 4, Helsinki <u>Espa 4</u> (booking: 11:30-19:00)</p>
Traficom	Jyrki Vähätalo, Toni Karppinen, Aleks Uttula, Irina Laine, Santeri Lunkka, Sten Sundberg, Tuomas Kokoi, [Hanna Suutarla -SPC]						
MINTC	Katja Viertävä						
17:15 (- 18:20)	<b>Debriefing and private meeting</b>	<b>All auditors</b>	<b>Ministry of Transport and Communications</b>				

Day 1 Monday (28 October 2024)			
Time (1)	Activity (2)	Participants (3)	Division and Location (4)
			<u>Espa 4</u>
18:20	Taxi	All auditors, SPC + 4	
18:30 - 19:30	Visiting onboard icebreaker IB POLARIS	<p><b>All auditors</b></p> <p><b>Member State representatives/bodies</b>  Arctia Ltd (Ship Owner): icebreaker director Paavo Kojonen</p> <p>MINTC Laura Eiro, Saara Reinimäki, Anne Miettinen  Traficom: Sanna Sonninen, Juha-Matti Korsi, Susanna Jansson, Hanna Suutarla  FTIA: Elisa Mikkolainen</p>	<p><b>Arctia Ltd</b>  Laivastokatu 9, 00160 Helsinki</p>
21:30	Taxi	All auditors, SPC + 4	

Day 2 Tuesday (29 October 2024)											
Time	Activity	Participants	Division and Location								
08:50	Transit by walking (total 270 m) and making the visitor registration at the Traficom's info desk (2nd floor).	All auditors, SPC									
0900-1000 (Session 7)	SOLAS (contd.)	<p>All auditors</p> <p>Member State representatives/bodies</p> <table border="1"> <tr> <td>Traficom</td> <td>Jyrki Vähätalo, Toni Karppinen, Aleksi Uttula, Irina Laine, Santeri Lunkka, Sten Sundberg, Tuomas Kokoi [Hanna Suutarla -SPC]</td> </tr> <tr> <td>MINTC</td> <td>Katja Viertävä (via skype if needed)</td> </tr> </table>	Traficom	Jyrki Vähätalo, Toni Karppinen, Aleksi Uttula, Irina Laine, Santeri Lunkka, Sten Sundberg, Tuomas Kokoi [Hanna Suutarla -SPC]	MINTC	Katja Viertävä (via skype if needed)	<p>The Finnish Transport and Communications Agency Traficom</p> <p>Head office Pasilan virastokeskus (Pasila Government Agency Center) Opastinsilta 12 A, FI-00520 Helsinki</p> <p>2<sup>nd</sup>* floor <u>Niemi</u> <small>* (first floor if calculated as done in England)</small></p>				
Traficom	Jyrki Vähätalo, Toni Karppinen, Aleksi Uttula, Irina Laine, Santeri Lunkka, Sten Sundberg, Tuomas Kokoi [Hanna Suutarla -SPC]										
MINTC	Katja Viertävä (via skype if needed)										
	Coffee break										
1000-1200 (Session 8)	<p><b>MARPOL</b></p> <ul style="list-style-type: none"> <li>Review of policies for the implementation and enforcement of MARPOL,</li> <li>Legislation</li> <li>Environment protection measures, penal provisions Implementation and enforcement of MARPOL</li> <li>Control measures, FSI, PSC review and improvement</li> <li>Reporting to IMO</li> <li>Interpretations left to the “satisfaction of the Administration”</li> </ul>	<p>All auditors</p> <p>Member State representatives/bodies</p> <table border="1"> <tr> <td>Traficom</td> <td>Ville-Veikko Intovuori, Aleksi Uttula, Hanna Suutarla - SPC; remotely Thomas Lundström, Mirja Ikonen</td> </tr> <tr> <td>MINTC:</td> <td>Laura Sarlin</td> </tr> <tr> <td>MOE</td> <td>Eeva-Maija Puheloinen, Sirkku Jaakkola</td> </tr> <tr> <td>The Finnish Border Guard</td> <td>Haapasaari Heli, Havas Eeva, <b>Patrick Lundqvist</b></td> </tr> </table>	Traficom	Ville-Veikko Intovuori, Aleksi Uttula, Hanna Suutarla - SPC; remotely Thomas Lundström, Mirja Ikonen	MINTC:	Laura Sarlin	MOE	Eeva-Maija Puheloinen, Sirkku Jaakkola	The Finnish Border Guard	Haapasaari Heli, Havas Eeva, <b>Patrick Lundqvist</b>	<p>The Finnish Transport and Communications Agency Traficom</p> <p>2<sup>nd</sup> floor, <u>Niemi</u></p>
Traficom	Ville-Veikko Intovuori, Aleksi Uttula, Hanna Suutarla - SPC; remotely Thomas Lundström, Mirja Ikonen										
MINTC:	Laura Sarlin										
MOE	Eeva-Maija Puheloinen, Sirkku Jaakkola										
The Finnish Border Guard	Haapasaari Heli, Havas Eeva, <b>Patrick Lundqvist</b>										

Day 2 Tuesday (29 October 2024)													
Time	Activity	Participants	Division and Location										
1200 – 1300	Lunch break	All auditors	Ravintola Vire, Pasilan virastokeskus Opastinsilta 12b, 2nd floor										
1300 - 1400	MARPOL (contd.)	<table border="1"> <thead> <tr> <th colspan="2">Member State representatives/bodies</th> </tr> </thead> <tbody> <tr> <td>Traficom</td> <td>Mirja Ikonen, Ville-Veikko Intovuori, Aleksi Uttula, Thomas Lundström {<i>Hanna Suutarla -SPC</i>}</td> </tr> <tr> <td>MINTC:</td> <td>Laura Sarlin</td> </tr> <tr> <td>MOE</td> <td>Sirkku Jaakkola, Eeva-Maija Puheloinen</td> </tr> <tr> <td>The Finnish Border Guard</td> <td>Eeva Havas, Heli Haapasaari, <b>Patrick Lundqvist</b></td> </tr> </tbody> </table>	Member State representatives/bodies		Traficom	Mirja Ikonen, Ville-Veikko Intovuori, Aleksi Uttula, Thomas Lundström { <i>Hanna Suutarla -SPC</i> }	MINTC:	Laura Sarlin	MOE	Sirkku Jaakkola, Eeva-Maija Puheloinen	The Finnish Border Guard	Eeva Havas, Heli Haapasaari, <b>Patrick Lundqvist</b>	The Finnish Transport and Communications Agency Traficom  2nd floor, <u>Niemi</u>
Member State representatives/bodies													
Traficom	Mirja Ikonen, Ville-Veikko Intovuori, Aleksi Uttula, Thomas Lundström { <i>Hanna Suutarla -SPC</i> }												
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MOE	Sirkku Jaakkola, Eeva-Maija Puheloinen												
The Finnish Border Guard	Eeva Havas, Heli Haapasaari, <b>Patrick Lundqvist</b>												

Day 2 Tuesday (29 October 2024)			
Time	Activity	Participants	Division and Location
1400 – 1500 (Session 9)	<b>COLREG, TONNAGE and LL</b> <ul style="list-style-type: none"> <li>• Legislation processes, amendments</li> <li>• Review of policies</li> <li>• Review of legislation, interpretations and guidance notes</li> <li>• Enforcement, penalties, examples</li> <li>• Reporting to IMO</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b>	The Finnish Transport and Communications Agency Traficom  2nd floor, <u>Niemi</u>
		Traficom : Tuomas Kokoi, Toni Karppinen, Ville Häyrynen, [Hanna Suutarla -SPC]	
		FTIA: Elisa Mikkolainen, Henri Hassi; Joonatan Ahlroos (via skype)	
		MINTC: Katja Viertävä (via skype if needed)	
		The Finnish Border Guard Patrick Lundqvist	
		Fintraffic Sari Talja (via skype)	
1500 – 1530 (Session 10)	<b>STCW</b> <ul style="list-style-type: none"> <li>• Implementation and enforcement of STCW</li> <li>• Table A-I/16 of STCW Code</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b>	The Finnish Transport and Communications Agency Traficom  2nd floor, Niemi
		Traficom : <b>Santeri Lunkka</b> , Matti Mämmi, Irina Laine, Aleksi Uttula [Hanna Suutarla -SPC]	
		MOEC Hyvönen Ilmari (via skype)	
		MINTC: Väinö Pitkänen	
		OPH Timo Repo (via skype if needed)	
		MOI Noora Pajukoski (via skype if needed)	

Day 2 Tuesday (29 October 2024)					
Time	Activity	Participants	Division and Location		
1530 – 1700 (Session 11)	<b>Surveyors' recruitment</b> <ul style="list-style-type: none"> <li>Process of recruitment of flag State surveyors and port State control officers (PSCOs)</li> <li>Qualification, training and continual improvement</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b> <table border="1"> <tr> <td>Traficom</td> <td>Juuso Halin (via teams), Thomas Lundström, Aleks Uttula [Hanna Suutarla -SPC]</td> </tr> </table>	Traficom	Juuso Halin (via teams), Thomas Lundström, Aleks Uttula [Hanna Suutarla -SPC]	The Finnish Transport and Communications Agency Traficom  2nd floor, Niemi
Traficom	Juuso Halin (via teams), Thomas Lundström, Aleks Uttula [Hanna Suutarla -SPC]				
1700	<b>Debriefing and private meeting</b>	<b>All auditors</b>	The Finnish Transport and Communications Agency Traficom  2nd floor, Niemi		
17-22:00	Hotel's meeting room is booked at the 29.10.2024 from 17:00 to 22:00		Original Sokos Hotel Tripla Pasila / kokoustila (meeting room) Fredikanterassi 1 B, 00520 Helsinki		

Day 3 Wednesday (30 October 2024)					
Time	Activity	Participants	Division and Location		
0900-1100 (Session 12)	<b>Delegation of authority and RO monitoring</b> <ul style="list-style-type: none"> <li>• Policy</li> <li>• Authorisation and RO Agreements</li> <li>• Instructions to RO</li> <li>• RO monitoring and oversight</li> <li>• Resources</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b> <table border="1"> <tr> <td>Traficom :</td> <td>Aleksi Uttula, Toni Karppinen, Thomas Lundström [Hanna Suutarla -SPC]</td> </tr> </table>	Traficom :	Aleksi Uttula, Toni Karppinen, Thomas Lundström [Hanna Suutarla -SPC]	The Finnish Transport and Communications Agency Traficom  2nd floor, Niemi
Traficom :	Aleksi Uttula, Toni Karppinen, Thomas Lundström [Hanna Suutarla -SPC]				
1100-1200 (Session 13)	<b>Port State Control:</b> <ul style="list-style-type: none"> <li>• PSC legislation</li> <li>• Practical implementation</li> <li>• PSC officers,</li> <li>• Statistics, Evaluation and review</li> <li>• Records</li> <li>• Evaluation and review</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b> <table border="1"> <tr> <td>Traficom :</td> <td>Aleksi Uttula, Juuso Halin, Thomas Lundström [Hanna Suutarla -SPC]</td> </tr> </table>	Traficom :	Aleksi Uttula, Juuso Halin, Thomas Lundström [Hanna Suutarla -SPC]	The Finnish Transport and Communications Agency Traficom  2nd floor, <u>Niemi</u>
Traficom :	Aleksi Uttula, Juuso Halin, Thomas Lundström [Hanna Suutarla -SPC]				
1200-1300	<b>Lunch break</b>	<b>All auditors</b>	Ravintola Vire, Pasilan virastokeskus Opastinsilta 12b, 2nd floor		
1300-1400 (Session 13)	<b>Port State Control (continues ):</b> <ul style="list-style-type: none"> <li>•</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b>	The Finnish Transport and Communications Agency Traficom  2nd floor, <u>Niemi</u>		
1400-1630 (Session 14)	<b>Flag State survey/inspection:</b> <ul style="list-style-type: none"> <li>• Policy on the survey/inspection,</li> <li>• Type of surveys/inspection</li> <li>• Exemption policies</li> <li>• FSI Instructions</li> <li>• Certificate Forms</li> <li>• Survey/inspection checklist</li> <li>• IMO guidance</li> <li>• Enforcement of ships, owners, and operators (examples)</li> <li>• Statistics, Evaluation and review</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b> <table border="1"> <tr> <td>Traficom :</td> <td>Aleksi Uttula, Toni Karppinen, Thomas Lundström, Ville-Veikko Intovuori, Juuso Halin, [Hanna Suutarla -SPC]</td> </tr> </table>	Traficom :	Aleksi Uttula, Toni Karppinen, Thomas Lundström, Ville-Veikko Intovuori, Juuso Halin, [Hanna Suutarla -SPC]	The Finnish Transport and Communications Agency Traficom  2nd floor, <u>Niemi</u>
Traficom :	Aleksi Uttula, Toni Karppinen, Thomas Lundström, Ville-Veikko Intovuori, Juuso Halin, [Hanna Suutarla -SPC]				

Day 3 Wednesday (30 October 2024)				
Time	Activity	Participants		Division and Location
	<ul style="list-style-type: none"> <li>Records</li> <li>Evaluation and review</li> </ul>			
<b>14:30- 15:10 (Session 19 A)</b>	<b>Casualty Investigation</b> <ul style="list-style-type: none"> <li>Processes</li> <li>Verification of samples, records</li> <li>Trend analysis</li> </ul> Evaluation	Regional State Administrative Agency for Southern Finland	Frans Lähdesmäki, Teemu Lukkari	
<b>15:15</b>	<b>Flag State continu.</b>			
<b>1630-1700 (Session 15)</b>	Meeting with SPC for field visits			The Finnish Transport and Communications Agency Traficom 2nd floor, Niemi
<b>1700</b>	<b>Debriefing and private meeting</b>	<b>All auditors</b>		The Finnish Transport and Communications Agency Traficom 2nd floor, <u>Niemi</u>
<b>18-22:00</b>	Hotel's meeting room is booked at the 30.10.2024 from 18:00 to 22:00			Original Sokos Hotel Tripla Pasila / kokoustila Fredikanterassi 1 B, 00520 Helsinki

Day 4 Thursday (31 October 2024)									
Time	Activity	Participants	Division and Location						
8:25	Taxi at the hotel	All auditors	Sokos Tripla						
0900-1100 (Session 16 )	<b>Field visit</b> <b>Coastal/Port State activities</b> <b>SOLAS Chapters IV and V and</b> <b>COLREG</b> <ul style="list-style-type: none"> <li>• SAR<sup>1</sup> (+ Radiocommunication services)</li> <li>• Meteorological<sup>2</sup></li> <li>• Operational pollution response (coastal areas) <sup>1</sup></li> <li>• Coordination, review and improvement</li> <li>• Reporting to IMO</li> <li>• Evaluation and review</li> <li>• Radiocommunication services</li> <li>• AtoN</li> </ul>	<b>All auditors</b>  <b>Member State representatives/bodies</b>	Border Guard Headquarters Vilhonvuorenkatu 6 00500 HELSINKI, FINLAD						
		<table border="1"> <tr> <td>SAR<sup>1</sup> + (Radiocommunication services)</td> <td>The Finnish Border Guard</td> <td><b>Sami Järvenpää</b>, Eeva Havas, Joonas Castren, Kim Westman</td> </tr> <tr> <td></td> <td>STM</td> <td></td> </tr> </table>		SAR <sup>1</sup> + (Radiocommunication services)	The Finnish Border Guard	<b>Sami Järvenpää</b> , Eeva Havas, Joonas Castren, Kim Westman		STM	
		SAR <sup>1</sup> + (Radiocommunication services)		The Finnish Border Guard	<b>Sami Järvenpää</b> , Eeva Havas, Joonas Castren, Kim Westman				
				STM					
		<table border="1"> <tr> <td>Meteorological<sup>2</sup></td> <td>Finnish Meteorological Institute<sup>2</sup>:</td> <td>Patrick Eriksson, Sanna Mäkinen</td> </tr> </table>		Meteorological <sup>2</sup>	Finnish Meteorological Institute <sup>2</sup> :	Patrick Eriksson, Sanna Mäkinen			
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Operational pollution response (coastal areas) <sup>1</sup>	The Finnish Border Guard	<b>Heli Haapasaari</b> , Eeva Havas							
<table border="1"> <tr> <td></td> <td>Ministry of Interior, Department for Rescue Services</td> <td><b>Ville Estlander</b></td> </tr> </table>		Ministry of Interior, Department for Rescue Services	<b>Ville Estlander</b>						
	Ministry of Interior, Department for Rescue Services	<b>Ville Estlander</b>							
1100 – 12:00	Lunch break	All auditors	Ravintola Kummeli Vilhonvuorenkatu 12, Sörnäinen						

Day 4 Thursday (31 October 2024)					
Time	Activity	Participants	Division and Location		
1200-1430 (Session 17)	<b>Field visit</b> <b>Coastal/Port State activities</b> <ul style="list-style-type: none"> <li>VTS<sup>3 4 5</sup> + safety radio communication</li> <li>Ship routeing (Safety of navigation)<sup>3 4 5</sup></li> <li>Hydrographic<sup>4 5</sup></li> <li>AtoN services<sup>4 5</sup></li> </ul> <p>(OBS. There is booked rooms for splitting up the audit team, if necessary)</p>	<b>All auditors</b>			
		<b>Member State representatives/bodies</b>			
		VTS <sup>3 4 5</sup> and <u>safety radio communication</u>	Fintraffic <sup>3</sup>	Sari Talja, Samu Koski	
			Finnish Transport Infrastructure Agency <sup>4</sup>	Toni Sobott	
			Traficom <sup>5</sup>	<b>Matti Latvalahti, Janne Virtanen</b>	
		Ship routeing (Safety of navigation) <sup>3 4 5</sup>	Fintraffic <sup>3</sup>	Sari Talja, Samu Koski	
			Finnish Transport Infrastructure Agency <sup>4</sup>	Elisa Mikkolainen, Joonatan Ahlroos, Toni Sobott	
			Traficom <sup>5</sup>	<b>Matti Latvalahti</b>	Valtteri Laine (via teams)
		Hydrographic <sup>4 5</sup>	Finnish Transport Infrastructure Agency <sup>4</sup>		Kalle Muinonen (via teams)
	Traficom <sup>5</sup>	Jouni Lappalainen, Rainer Mustaniemi	Juha Tiihonen (via teams)		

Fintraffic Vessel Traffic Services Ltd  
Gulf of Finland VTS Centre  
Vilhonvuorenkatu 6  
00500 HELSINKI, FINLAND

Day 4 Thursday (31 October 2024)					
Time	Activity	Participants		Division and Location	
		AtoN services <sup>4 5</sup>	Finnish Transport Infrastructure Agency <sup>4</sup>	Elisa Mikkolainen, <b>Joonatan Ahlroos</b>	Simo Kerkelä (via teams)
			Traficom <sup>5</sup>	<b>Henrika Björkell-Virta</b>	Maarit Mikkellsson, Janina Tapia Cotrino (via teams)
14:30 - 14:45	Coffee				
14:50	Taxi				
<b>Presentations</b> <b>15:30 - 16:15</b>  <b>Inside the harbour area:</b> <b>16:20 - 17:00</b>  <b>(Session 18)</b>	<ul style="list-style-type: none"> <li>Provision of port reception facilities<sup>6 8</sup></li> <li>Handling of dangerous goods (e.g. IMDG Code) <sup>5 8 9</sup></li> <li>Operational pollution response (port areas)<sup>7 8</sup></li> <li>Verified Gross Mass (VGM) <sup>5 8 9</sup></li> </ul>	Provision of port reception facilities <sup>6 8</sup>	ELY <sup>6</sup>	Suvi Hjorth	Gatehouse (Vuosaari Harbour) Komentosilta 1 00980 Helsinki, Finland
			Traficom	Mirja Ikonen, [Hanna Suutarla - SPC]	
			LVM	Laura Sarlin	
			Port of Helsinki Ltd <sup>8</sup>	Valu Tero; Hinttaniemi Tero	
		Handling of dangerous goods (e.g. IMDG Code) <sup>5 8 9</sup>	Traficom <sup>5</sup>	Miina Grönlund, Sami Sällsten, Jyrki Vähätalo	
			Port of Helsinki Ltd <sup>8</sup>	Valu Tero; Hinttaniemi Tero	

Day 4 Thursday (31 October 2024)			
Time	Activity	Participants	Division and Location
		Operational pollution response (port areas) <sup>7 8</sup>	Mol, The Department for Rescue Services <sup>7</sup> (Port of Helsinki Ltd <sup>8</sup> ) Ville Estlander Valu Tero; Hinttaniemi Tero
		Verified Gross Mass (VGM) <sup>5 8 9</sup>	Traficom <sup>5</sup> Jyrki Vähätalo (Port of Helsinki Ltd <sup>8</sup> ) /Finnsteve Valu Tero; Hinttaniemi Tero
18:30	back at the Sokos Hotel Tripla		
18-22:00	Debriefing and private meeting	All Auditors	Original Sokos Hotel Tripla Pasila / kokoustila Fredikanterassi 1 B, 00520 Helsinki

Day 5 Friday (1 November 2024)			
Time	Activity	Participants	Division and Location
08:45	<ul style="list-style-type: none"> <li>Transit by walking (total 400 m)</li> </ul>	All auditors, SPC	
0900 – 1030 (Session 19)	<b>Casualty Investigation</b> <ul style="list-style-type: none"> <li>Processes</li> <li>Verification of samples, records</li> <li>Trend analysis</li> <li>Evaluation</li> </ul>	All auditors  Member State representatives/bodies	Safety Investigation Authority (Onnettomuustutkintakeskus OTKES) Ratapihantie 9 00520 HELSINKI meeting room Veturi, 6. floor

		Safety Investigation Authority	Kurt Kokko, Suvi Jokinen, Risto Haimila, Ilkka Kervinen, (Hannu Hänninen, Heikki Harri via teams), Tiina Bieber	
		Traficom	[Hanna Suutarla -SPC]	
	<b>Coffee break</b>			
<b>10:40</b>	Transit by walking (total 240 m)	<b>All auditors, SPC</b>		
<b>1045 – 1200 (Session 20)</b>	<b>Outstanding issues/ Debriefing</b>	<p><b>All auditors and SPC</b>  Heli Haapasaari -FCG  Sami Järvenpää - FCG  Joonatan Ahlroos FTIA  Katja Viertävä - MoTC  Anne Miettinen - MoTC</p> <p>Toni Karppinen - Traficom  Juha-Matti Korsi - Traficom  Intovuori Ville - Traficom  Jansson Susanna - Traficom  Lundström Thomas - Traficom  Aleksi Uttula - Traficom  Hanna Suutarla – Traficom  -----  Jansson Susanna – Traficom  Hanna Suutarla – Traficom</p>	<p>The Finnish Transport and Communications Agency  Traficom  2nd floor  Niemi</p>	
<b>1200 – 1300</b>	<b>Lunch break</b>	<b>All auditors</b>		Ravintola Vire, Pasilan virastokeskus Opastinsilta 12b, 2nd floor
<b>1330 – 00:00 (Session 21)</b>	Review of documents and drafting of report	<p><b>All auditors</b></p> <p><b>Member State representatives/bodies</b>  SPC stand-by in the lobby</p>		<p>The Finnish Transport and Communications Agency Traficom  2nd floor  Niemi</p>

<b>Day 6 Saturday 2 November 2024</b>			
<b>Time (LT)</b>	<b>Activity</b>	<b>Participants</b>	<b>Location</b>
<b>By afternoon hrs</b>	Drafting of findings, observations and consolidation of the draft audit interim report (DIR) and draft Executive Summary Report (DESR) by Saturday afternoon.  ATL to send the draft reports and findings (if any), to SPC as a MS Word document.	ATL	The hotel's meeting room is booked for 02.11.2024 from 08:00 to 14:00.

<b>Day 7 Sunday 3 November 2024</b>			
<b>Time (LT)</b>	<b>Activity</b>	<b>Participants</b>	<b>Location</b>
<b>By afternoon hrs</b>	SPC to return the draft audit report with comments and remarks to ATL, by Sunday afternoon.	ATL	The hotel's meeting room is booked for 03.11.2024 from 12:00 to 19:00.
<b>By 1800 hrs</b>	ATL to finalise DIR, DESR and findings (if any) by incorporating comments from SPC, sign FD/OB (if any) by Sunday evening.	ATL and SPC	The hotel's meeting room is booked for 03.11.2024 from 12:00 to 19:00.

Day 8 Monday 4 November 2024																	
Time	Activity	Participants	Division/ Location														
8:50	Taxi at the hotel	All auditors	Sokos Tripla														
09:30 - 10:30	<p><b>Closing Meeting</b></p> <p>Submission of draft interim report (DIR) including findings and observations, and draft executive summary report (DESR)</p>	<p><b>All auditors</b></p> <p><b>Member State representatives/bodies</b></p> <table border="1"> <tr> <td>MINTC</td> <td>Saara Reinimäki, Anne Miettinen</td> </tr> <tr> <td>MOE</td> <td>Milka Parviainen, Eeva-Maija Puheloinen</td> </tr> <tr> <td>The Finnish Border Guard</td> <td>Sami Järvenpää, Eeva Havas, Heli Haapasaari</td> </tr> <tr> <td>FTIA</td> <td>Jarkko Toivola, Elisa Mikkolainen, Joonatan Ahlroos</td> </tr> <tr> <td>Safety Investigation Authority</td> <td>Kurt Kokko, Risto Haimila, Ilkka Kervinen, Tiina Bieber</td> </tr> <tr> <td>FMI</td> <td>Patrick Eriksson, Sanna Mäkinen</td> </tr> <tr> <td>Traficom</td> <td>Juha-Matti Korsi, Hanna Suutarla, Sanna Sonninen, Susanna Jansson, Räisänen Ville</td> </tr> </table>	MINTC	Saara Reinimäki, Anne Miettinen	MOE	Milka Parviainen, Eeva-Maija Puheloinen	The Finnish Border Guard	Sami Järvenpää, Eeva Havas, Heli Haapasaari	FTIA	Jarkko Toivola, Elisa Mikkolainen, Joonatan Ahlroos	Safety Investigation Authority	Kurt Kokko, Risto Haimila, Ilkka Kervinen, Tiina Bieber	FMI	Patrick Eriksson, Sanna Mäkinen	Traficom	Juha-Matti Korsi, Hanna Suutarla, Sanna Sonninen, Susanna Jansson, Räisänen Ville	<p>Location: Ministry of Transport and Communications Eteläesplanadi 4, Helsinki Paja 4.11. (08-11)</p>
MINTC	Saara Reinimäki, Anne Miettinen																
MOE	Milka Parviainen, Eeva-Maija Puheloinen																
The Finnish Border Guard	Sami Järvenpää, Eeva Havas, Heli Haapasaari																
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Traficom	Juha-Matti Korsi, Hanna Suutarla, Sanna Sonninen, Susanna Jansson, Räisänen Ville																

Ministry of Transport and Communications	MINTC	LVM
Ministry of the Environment	MOE	YM
Prime Minister's Office	PMO	VNK
Ministry of the Interior	MOI	SM
Ministry of Justice	MOJ	OM
Ministry of Education and Culture	MOEC	OKM
Ministry of Social Affairs and Health	MOSAH	STM
Finnish Transport and Communications Agency		Traficom
Finnish Transport Infrastructure Agency (FTIA)	FTIA	Väylä
Finnish Meteorological Institute (FMI)	FMI	IL
Finnish Border Guard	FBG	Raja
Finnish Environment Institute		Syke
Fintraffic		
Safety Investigation Authority, Finland (SIAF)	SIAF	Otkes
Finnish Customs		Tulli
Regional State Administrative Agencies (AVI)		AVI
Centre for Economic Development, Transport and the Environment	ELY	ELY
Rescue departments of wellbeing services counties		Pelastuslaitos
Police		Poliisi
Finnish National Agency for Education		OPH
Finnish Education Evaluation Centre (FINEEC)	FINEEC	Karvi

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**ANNEX 2**  
**AGENDA AND LIST OF ATTENDEES TO THE OPENING MEETING**

**1. Agenda of the opening meeting**

- .1 Opening statement by Secretary General
- .2 Introduction of the audit team
- .3 Background history and the purpose of the audit
- .4 Review and confirmation of the provisional audit programme, including the purpose, scope, and objectives of the audit
- .5 Short summary of the methods and procedures to be used to conduct the audit
- .6 Official communication links between the audit team and the auditee
- .7 Facilities and administrative arrangements
- .8 Programme of visits to the entities in the maritime administration and other involved organizational elements
- .9 Time, date and place of the closing meeting and any interim meetings of the audit team and the SPC
- .10 Procedures for documenting audit findings and observations, providing response to such findings and observations and agreeing them
- .11 Confidentiality of findings and observations, i.e., the auditors to agree with the auditees any controls on evidence obtained during the audit and disposal of report findings and observations and report copies; and
- .12 Agreement that a draft audit interim report and a draft executive summary report would be tabled during the closing meeting.
- .13 Other items.

**2. List of attendees-Opening meeting**

No.	Name	Designation	Name of entity
1	Laura Eiro	Secretary General	Ministry of Transport and Communications
2	Saara Reinimäki	Director of Unit	Ministry of Transport and Communications
3	Anne Miettinen	Senior Ministerial Adviser	Ministry of Transport and Communications
4	Katja Viertävä	Senior Ministerial Adviser	Ministry of Transport and Communications
5	Laura Sarlin	Ministerial Adviser	Ministry of Transport and Communications

No.	Name	Designation	Name of entity
6	Arto Teronen	Director of Field Operations	The Ministry of Social Affairs and Health
7	Noora Pajukoski	Senior Specialist, Legal Affairs	The Ministry of Social Affairs and Health
8	Sari Talja	Operative Director	Fintraffic Vessel Traffic Services Ltd
9	Sami Järvenpää	Head of Maritime Safety Unit	The Finnish Border Guard
10	Heli Haapasaari	Marine pollution response expert	The Finnish Border Guard
11	Eeva Havas	Senior officer (legal)	The Finnish Border Guard
12	Juha Vuolle	Deputy Chief of Operational Division	The Finnish Border Guard
13	Jarkko Saarimäki	Director-General	Finnish Transport and Communication Agency, Traficom
14	Sanna Sonninen	Director of Maritime Transport	Finnish Transport and Communication Agency, Traficom
15	Hanna Suutarla	Special advisor (SPC)	Finnish Transport and Communication Agency, Traficom
16	Juha-Matti Korsi	Head of Unit	Finnish Transport and Communication Agency, Traficom
17	Susanna Jansson	Head of Unit	Finnish Transport and Communication Agency, Traficom
18	Jussi Soramäki	Senior Ministerial Advisor	Prime Minister's Office, Government Strategy department
19	Ville Estlander	Senior Officer for Rescue Services	Ministry of the Interior, Department for Rescue Services
20	Jarkko Toivola,	Director, Waterways	Finnish Transport Infrastructure Agency
21	Elisa Mikkolainen	Director, Waterways Department	Finnish Transport Infrastructure Agency
22	Joonatan Ahlroos	Project Manager, Waterways Management	Finnish Transport Infrastructure Agency
23	Mika Raateoja	Environmental Safety Manager	Finnish Environment Institute
24	Tommi Kontto	Project manager	Finnish Environment Institute
25	Juhana Hyrkkänen	Director	Finnish Meteorological Institute
26	Patrick Eriksson	Head of group Oceanographic Services	Finnish Meteorological Institute
27	Sanna Mäkinen	Quality Manager	Finnish Meteorological Institute

No.	Name	Designation	Name of entity
28	Jenni Ojala	The head of unit (Environmental protection)	Centre for Economic Development, Transport and the Environment
29	Suvi Hjorth	Senior Officer	Centre for Economic Development, Transport and the Environment
30	Petri Lempinen	Director General	Ministry of Education and Culture
31	Katri Tervaspalo	Opetusneuvos	Ministry of Education and Culture
32	Arto Teronen	Director of Field Operations	Ministry of Social Affairs and Health
33	Noora Pajukoski	Senior Specialist, Legal Affairs	Ministry of Social Affairs and Health
34	Kurt Kokko	Executive Director	Safety Investigation Authority Finland
35	Suvi Jokinen	Administrative Director	Safety Investigation Authority Finland
36	Tiina Bieber	Head of Communications	Safety Investigation Authority Finland
37	Risto Haimila	Chief Safety Investigator (Marine)	Safety Investigation Authority Finland
38	Ilkka Kervinen	Senior Safety Investigator (Marine)	Safety Investigation Authority Finland
39	Saara Bäck	Senior Ministerial Adviser	Ministry of the Environment
40	Eeva-Maija Puheloinen	Senior Specialist, Legal Affairs	Ministry of the Environment
41	Teemu Lukkari	Senior Inspector	Regional State Administrative Agency for Southern Finland
42	Frans Lähdesmäki	Inspector	Regional State Administrative Agency for Southern Finland

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## ANNEX 3 STRUCTURE OF THE MARITIME ADMINISTRATION

