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## **Guidance notes for performing statutory work on behalf of Traficom**

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

### **Statutory Conditions**

All statutory conditions, exemptions etc. shall be issued by Traficom.

### **Change of Home Port or Ship Name**

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

### **Load line grid letters of the issuing authority**

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

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

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

### **Multiple load line certificates**

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

### **Control of sea inlets**

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

In periodically unattended machinery spaces the valves for main and auxiliary sea inlets and discharges in connection with operation of machinery shall normally be capable of being closed from a position above the freeboard deck. Exceptions to

this are valves for discharges having the outboard end above the deepest load water line.

Traficom may accept the controls of such valves to be located at a platform below the freeboard deck provided calculations show that in the event of a full bore discharge from the largest sea inlet or discharge, the time of flooding to the control position after the initiation of the bilge high level alarm is in the order of 30 minutes.

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

## **MARPOL V**

Garbage Record Book shall be approved by Administration. Form can be download via <https://www.Traficom.fi/>

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

## **Ballast Water Management Convention**

The Finnish Transport and Communications Agency allows the decoupling of the IOPP certificate from the Harmonised System of Survey and Certification to facilitate the implementation of the Ballast Water Management (BWM) Convention on ships.

Decoupling of the IOPP certificate is relevant for certain ships until 8 September 2022.

## **Stability**

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

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

## **Dry docking extended past the five year interval**

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

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

## **Bottom survey afloat for cargo ships**

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

## **Hong Kong Convention**

At the moment it is not possible to authorize any surveys and certificates related to the Hong Kong Convention, because Finland has not yet ratified the Hong Kong Convention.

### **Data Collection System for Fuel Oil Consumption of Ships**

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

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

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

The national accreditation body for accreditation of verifiers is FINAS.

<https://www.finas.fi/sites/en>

### **ECDIS –updates, compliance with IHO standards**

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

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

### **Electronic logbooks**

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

### **Requirements for certification of radio personnel and Form R**

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

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

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

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

### **Portable aeronautical VHF equipment on passenger ships**

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

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

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

**Use of remote survey**

Remote survey may be used in surveys except initial and renewal surveys. Information about the RO remote system must be sent for information to Traficom before using it for the first time.

**Survey of non-convention ship**

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

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

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

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