
Date issued: 9 June 2021	Entry into force: 9 June 2021	Validity: until further notice
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Legal basis:
Act on Ships' Crews and the Safety Management of Ships 1687/2009, Act on Transport Services (320/2017), Government Decree on the Manning of Ships and Certification of Seafarers 508/201

Reporting seagoing service in the Transport Register

1 Obligation to report in the Transport Register

The owners of vessels are obligated to report the seagoing service records of the crew members of their Finnish ships in the Transport Register in accordance with the Act on Ships' Crews and the Safety Management of Ships (1687/2009) (hereinafter the Act on Ships' Crews).

The seagoing service report submitted to the Finnish Transport and Communications Agency by the vessel owner or their representative must include the personal details of a person admitted to crew position, the person's tasks aboard the vessel, their start and end times and the number of working days aboard the vessel during its service, the details and identifier of the vessel and the trading area of the vessel during the person's employment.

The report must be submitted so that the number of days worked in a month is reported by the end of the next calendar month or, following the end of an uninterrupted period of employment, by the end of the following calendar month. For vessels in seasonal service, reports can be submitted per sailing season.

Section 26 e of the Act on Ships' Crews lists the exceptions to the registration and listing obligation, based on which information does not need to be entered into the register. However, the seagoing service of a person working on a foreign vessel can be entered into the register based on the seafarer's or vessel owner's request if the other criteria for seagoing service are fulfilled.

2 Vessel in service

Seagoing service includes all the days on which the vessel has been in service. A vessel is considered to be in service when it is at sea, anchored or at berth, when it is manned in accordance with the minimum safe manning document and when the vessel's normal working routines are followed aboard. A vessel does not need to be running to be in service.

If the vessel is at port and not manned in accordance with the service requirements, the crew's service information cannot be registered as seagoing service and their service should not be reported as if the vessel was in service.

If the vessel is at port or in regular dry dock, for example, in accordance with its regular service, manned in accordance with the minimum safe manning document and regular working routines are followed aboard, the work carried out by a person employed in a crew position is considered seagoing service.

When reporting seagoing service, the owner must consider;

- whether the vessel is manned in accordance with the minimum safe manning document;

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- whether normal working routines are followed on the vessel, meaning that the tasks maintain and develop professional competence;
- the duration of the time spent at port. Seagoing service must consist of service that is relevant to the person's certificate of competency. For example, the preparations for a voyage and making a ship ready to be laid up can be counted as seagoing service if the work is an essential part of a voyage;
- that dockings that are part of the normal operation of vessels can be reported as seagoing service;
- that seagoing service at port and dock is reported in accordance with the ship's trading area (such as Baltic Sea trade, if the ship operates in the Baltic Sea and is manned in accordance with a minimum safe manning document for the Baltic Sea).

3 Approving and reporting service corresponding to seagoing service

If work carried out aboard a vessel cannot be reported as seagoing service, the service can be assessed as constituting corresponding service when applying for the renewal of a certificate of competency. Working days spent in corresponding service can be counted towards the renewal of a certificate of competency when the service has been relevant to the certificate of competency to be renewed (deck crew or engine officer position) and contributed to maintaining the person's competence.

For example, work carried out in a crew position aboard an icebreaker or multipurpose icebreaker during its maintenance season (not in service and not manned in accordance with the minimum safe manning document) or aboard a passenger or cargo vessel while it is temporarily laid up at port can be counted as corresponding service if it maintains the person's professional competence.

The owner of the vessel issues a certificate for corresponding service that describes in as much detail as possible the person's tasks and the working period. The certificate is used to assess whether the tasks contributed to maintaining the person's professional competence. Corresponding service is always assessed on a case by case basis.

4 Crew positions

Only the crew positions that the Finnish Transport and Communications Agency Traficom has separately [announced](#) as requiring registration need to be registered in the Transport Register. If the position in which the seafarer has served is not included in the list, the best corresponding position should be picked instead. However, correspondence should be considered in light of relevant seafaring-related boundary conditions, such as the fact that a vessel can only have one master at a time who bears the associated responsibilities on the vessel. In other words, seagoing service cannot be reported for multiple masters on the same

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vessel, except for days on which the crew changes and responsibilities are actually transferred from one master to another and the change is recorded in the logbook.

Crew positions in which seafarers cannot actually serve are not reported in the register. For example, the 'master c.d.' position means that the vessel's minimum safe manning document allows the master of the vessel to also serve as the vessel's chief engineer officer as long as they hold an engine attendant's certificate. If the vessel actually has a chief engineer officer in addition to a master, the master does not actually serve in this position, in which case the position should not be reported in the register as such.

5 Reporting seagoing service as part of an HR system

The vessel owner must ensure that seagoing service is only reported in the register when the vessel has been in service and for the position in which the seafarer has actually served. The person must be qualified to serve in the position for which they have been employed. If the person has for technical reasons been paid wages in accordance with some other crew position, the arrangement must not affect the reporting of seagoing service in a register maintained by the authorities. In other words, the seagoing service must be reported according to the position in which the person has actually served and in which they are qualified to serve.

It is the vessel owner's responsibility to resolve any technical challenges in the systems that they use and report accurate information in the Transport Register.

6 Reporting seagoing service

Seagoing service can be reported in the Transport Register via an API or in some other electronic format as ordered by the Finnish Transport and Communications Agency (section 26 c, subsection 3 of the Act on Ships' Crews).

The owner can report seagoing service by logging in to Traficom's e-services. The login to the e-service is done via Suomi.fi e-Authorizations. The information is recorded based on Finnish personal identity codes and the details included in the Register of Ships. Reporting via e-service is the ideal choice for smaller shipping companies and vessels in seasonal service. Seagoing service cannot be reported for vessels that are recorded in the Watercraft Register.

Shipping companies can also report seagoing service via an application programming interface (API) designed for the purpose. The use of the API is subject to a separate agreement. The API is ideal for shipping companies that operate several Finnish vessels and have large numbers of crew. The interface is a RESTful API, and the information is transmitted in XML format. If you would like to start using the API, please contact us by sending an email to [merimiesrekisteri\(at\)traficom.fi](mailto:merimiesrekisteri(at)traficom.fi).

Shipping companies can also submit information on seagoing service as a text file (.txt). This option must always be separately agreed upon with Traficom, but using

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it does not require the signing of a dedicated agreement. The .txt. files must be sent by email to merimiesrekisteri(at)traficom.fi.

If electronic reporting is not possible, a vessel owner can also currently report seagoing service using a [form](#) published by Traficom by sending the electronically filled-in form via email to merimiesrekisteri(at)traficom.fi. The seafarer must prove their seagoing service with a signed form.

Enquiries

merimiesrekisteri(a)traficom.fi