

IMSAS – Session 10

STCW

October 29, 2024

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STCW responsibilities

- ▶ Unit of maritime qualifications
 - ▶ Issues all STCW certificates
 - ▶ Registers (reg I/2.14)
 - ▶ [Act on Ships' Crews and the Safety Management of Ships \(1687/2009 Ch 2a\)](#)
 - ▶ Head of unit + 11 inspectors or senior inspectors
- ▶ Department of seafarers and boating
 - ▶ 1 special adviser responsible for qualifications & manning
 - ▶ 2 special advisers responsible for MET approvals
 - ▶ 1 special adviser responsible for data systems
 - ▶ 1 maritime lawyer

Reporting authority in national legislation

- ▶ *The Finnish Transport and Communications Agency shall submit the notifications required in the STCW Convention and the Directive on Minimum Level of Training of Seafarers to the IMO, European Commission, European Union member states and to other contracting parties of the STCW Convention.*
- ▶ (Act on Transport Services 320/2017, section 194)

STCW Code section A-I/16

Initial communication of information

- ▶ Art IV, Reg I/7 and section A-I/7 para 2
- ▶ Finland sent the initial communication of information at 24 July 1998
- ▶ The MSC confirmed that full and complete effect is given by MSC/Circ.978 dated 6 December 2000

Subsequent reports - Equivalents

- ▶ Finland has equivalent arrangements for the use of simulator training to replace seagoing service
 - ▶ Advanced IGF CoP
 - ▶ 1 month seagoing service can be substituted by approved simulator training
 - ▶ II/1, II/3, III/1 and III/6
 - ▶ 1 month seagoing service can be substituted by approved simulator training
- ▶ Reported to the IMO on 27 September 2022

Subsequent reports – Recognition of certificates

- ▶ Finland has reported the summary of measures taken to ensure compliance with regulation I/10 also as part of the last subsequent report on 14 October 2022

Subsequent reports – Alternative certification

- ▶ Finland does not issue alternative certification according to the Ch VII

Subsequent reports – Communication of information

- ▶ Last periodic independent evaluation sent to the IMO on 14 October 2022
 - ▶ 11 October 2023 the panel sent its answer
 - ▶ 17 October 2023 Traficom enquired if the previous periodic report had been taken into account (Manila amendments)
 - ▶ 19 October 2023 the panel sent the revised report requesting additional reporting
 - ▶ 3 July 2024 Traficom sent the report of additional evaluation and is waiting for answer
- ▶ Earlier reports 1998, 2002, 2007, 2012 and 2017
- ▶ STCW amendments have been reported always as part of periodic reports

Subsequent reports – Conduct of trials

- ▶ Act on Ships' Crews and the Safety Management of Ships (1687/2009 section 13 a) - Manning and watchkeeping trial permit
 - ▶ Manning/watchkeeping/qualification requirements
 - ▶ Only on domestic voyages
 - ▶ May include conditions
 - ▶ Not exceeding two years, may not be renewed
- ▶ No applications or issued trial permits so far

Subsequent reports – Dispensations

- ▶ Report of year 2023 dispensations was sent to IMO on 26 February 2024
- ▶ Previous reports
 - ▶ 17 January 2023
 - ▶ 18 February 2022
 - ▶ Year 2021 report can't be found
 - ▶ 29 January 2020

Fitness for duty and watchkeeping arrangements – fatigue prevention

- ▶ [Seafarers' Working Hours Act \(296/1976\)](#)
 - ▶ supervised by the labour protection authorities (Regional State Administrative Agencies)
- ▶ Regulation on watchkeeping on ships (TRAFI/16654/03.04.01.00/2011)
- ▶ Principles of minimum safe manning (resolution A.1047(27))
 - ▶ [Act on Ships' Crews and the Safety Management of Ships \(1687/2009 section 7\)](#)
 - ▶ [Government Decree on the Manning of Ships and Certification of Seafarers \(508/2018 section 3\)](#)

Fitness for duty and watchkeeping arrangements – Prevention of drug and alcohol abuse

- ▶ Waterway traffic intoxication
 - ▶ [Act on Ships' Crews and the Safety Management of Ships \(1687/2009 section 36\)](#)
- ▶ Regulation on watchkeeping on ships 3.1 general principles and 4.3.4. taking over the watch (TRAFI/16654/03.04.01.00/2011)
- ▶ Seafarers' Employment Contracts Act (756/2011 section 19 a)
Obligation of an employee to take a breathalyzer test on board
- ▶ ISM, company drug & alcohol policy
 - ▶ Employment contracts often reference to the company policy
 - ▶ Commitment to the policy agreed in writing

Fitness for duty and watchkeeping arrangements – principles to be observed

- ▶ Regulation on watchkeeping on ships (TRAFI/16654/03.04.01.00/2011)
 - ▶ Reflects directly the Regulation VIII/2 requirements

Thank you