

TRAFICOM

Finnish Transport and Communications Agency

Session 5 - Common areas

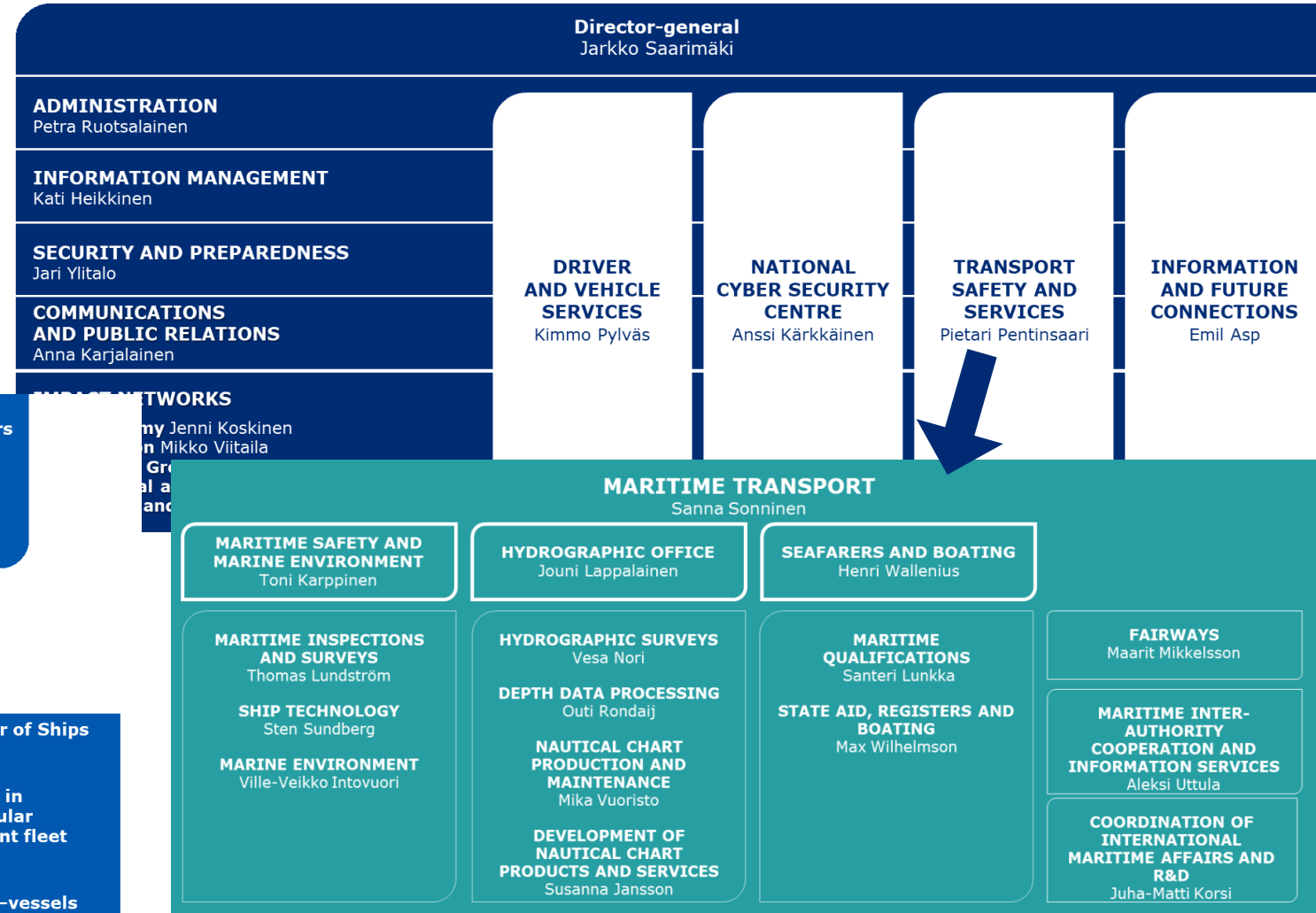
**Records,
Communication of information to IMO
Improvement**



The Finnish Transport and Communications Agency - Traficom

Rail regulatory body
Juha Karjanlahti

- ▶ A central government agency operating in the administrative branch of the Ministry of Transport and Communications.
- ▶ Traficom promotes the development of the information and the transport functional and safe transport and communication connections and services.



Person-years
~1070

In maritime
~130

Seafarers' certificates
5,035

Sea areas covered by full-coverage surveys
73.9 %

Users of electronic nautical charts
5,546

Register of Ships
1 150

Vessels in the regular merchant fleet
671

Watercraft Register
241 002

SOLAS -vessels
108

Legislation governing Traficom or defining its tasks

19.6.2019/782	Vesiliikennelaki	Waterborne Transport Act
11.6.1993/512	Alusrekisterilaki	Vessel Register Act
15.7.1994/674	Merilaki	Maritime Act
2.8.1994/719	Laki vaarallisten aineiden kuljetuksesta	Transport of Dangerous Goods Act
24.5.2017/320	Laki liikenteen palveluista	Act on Transport Services
29.12.2009/1687	Laki laivaväestä ja aluksen turvallisuusjohtamisesta	Act on the Ship's Crew and Safety Management of Ships
29.12.2009/1686	Laki aluksen teknisestä turvallisuudesta ja turvallisesta käytöstä	Act on Technical Safety and Safe Operation of Ships
29.12.2009/1672	Merenkulun ympäristönsuojelulaki	Maritime Environmental Protection Act
5.8.2005/623	Alusliikennepalvelulaki	Vessel Traffic Services Act
11.6.2004/485	Laki eräiden alusten ja niitä palvelevien satamien turvatoimista ja turvatoimien valvonnasta	Act on security measures and the supervision of security measures for certain ships and the ports serving them
29.12.2011/1503	Laivavarustelaki	Ship's Equipment Act
23.11.2018/935	Laki Liikenne- ja viestintävirastosta	Act on the Finnish Transport and Communications Agency
21.12.2004/1206	Laki eräiden irtolastialusten turvallisesta lastaamisesta ja lastin purkamisesta	Act on the safe loading and unloading of certain bulk carriers
17.3.1995/370	Laki alusturvallisuuden valvonnasta	Act on the Supervision of Ship Safety

Traficom's responsibilities in relation to Code III

Flag State Responsibilities	Coastal State Responsibilities
Certificates and endorsements issued to seafarers	Radio communication services
Approval and control of seafarer training providers and training programmes	Hydrographic services
Interpretations of cases where the international claim can be resolved to the satisfaction of the Administration	Ships' routing; setting up or discontinuing traffic separation schemes
Ensuring adequate safe manning of Finnish ships	Ships' routing; Enforcement of traffic separation schemes
Authorisation of recognised organisations (RO)	Mandatory ship reporting (GOFREP)
Supervision of nominated surveyors, tonnage surveyors, inspectors and class (RO)	Mandatory ship reporting systems
Vessel seaworthiness requirement	VTS services
Vessel inspection requirement	Aids to navigation (ATON)
Certification of ships	Surveillance of ships' emission (according to MARPOL)
Port State Responsibilities	
Port State control (PSC)	
Register of fuel oil suppliers	

Records and Registers

8842T
To 488

Records

- ▶ According to **the Public Information Management Act (906/2019)** all authorities must maintain **an information management model** which defines and describes the information management in its operating environment. The model is maintained to design and implement the management of services, consideration and datasets, to implement the rights and restrictions relating to access to information, to decrease multiple collection of information, to implement the interoperability of information systems and information pools and to maintain information security.
- ▶ According to **the Archives Act (831/1994)** all authorities must maintain **a filing plan** which includes information about the documents arising from the authority's processes, including their storage periods. The filing plan produces automatic metadata for the documents in an electronic case management system, where all the documents from processing a case are stored.
- ▶ The plans in question and the data security measures defined in the Public Information Management Act ensure the **availability, usability, data protection, integrity, originality, preservation and disposal of information.**
- ▶ **Authorities** are responsible for managing, sharing and storing documents and other data, **each within their own area of responsibility.** Data access rights and access management have also been defined for the authorities' registers. The responsibilities for **maritime statistics are generally divided between Statistics Finland, Traficom and Customs.**
- ▶ Documents and data in registers requiring **permanent storage are transferred to the National Archives.** Other data is destroyed in a data secure manner after the end of the storage period. The General Data Protection Regulation (**GDPR**) sets out specific requirements regarding the collection, storage and management of personal data. The processing of personal data is governed by the Data Protection Act (1050/2018), which specifies and supplements the GDPR in Finland.

Legislation regarding records

- ▶ Act on Information Management in Public Administration:
<https://www.finlex.fi/en/laki/kaannokset/2019/en20190906>
- ▶ Archives Act (831/1994) (No official English translation available)
<https://finlex.fi/fi/laki/ajantasa/1994/19940831>
- ▶ Data Protection Act (1050/2018)
https://finlex.fi/en/laki/kaannokset/2018/en20181050_20240029.pdf

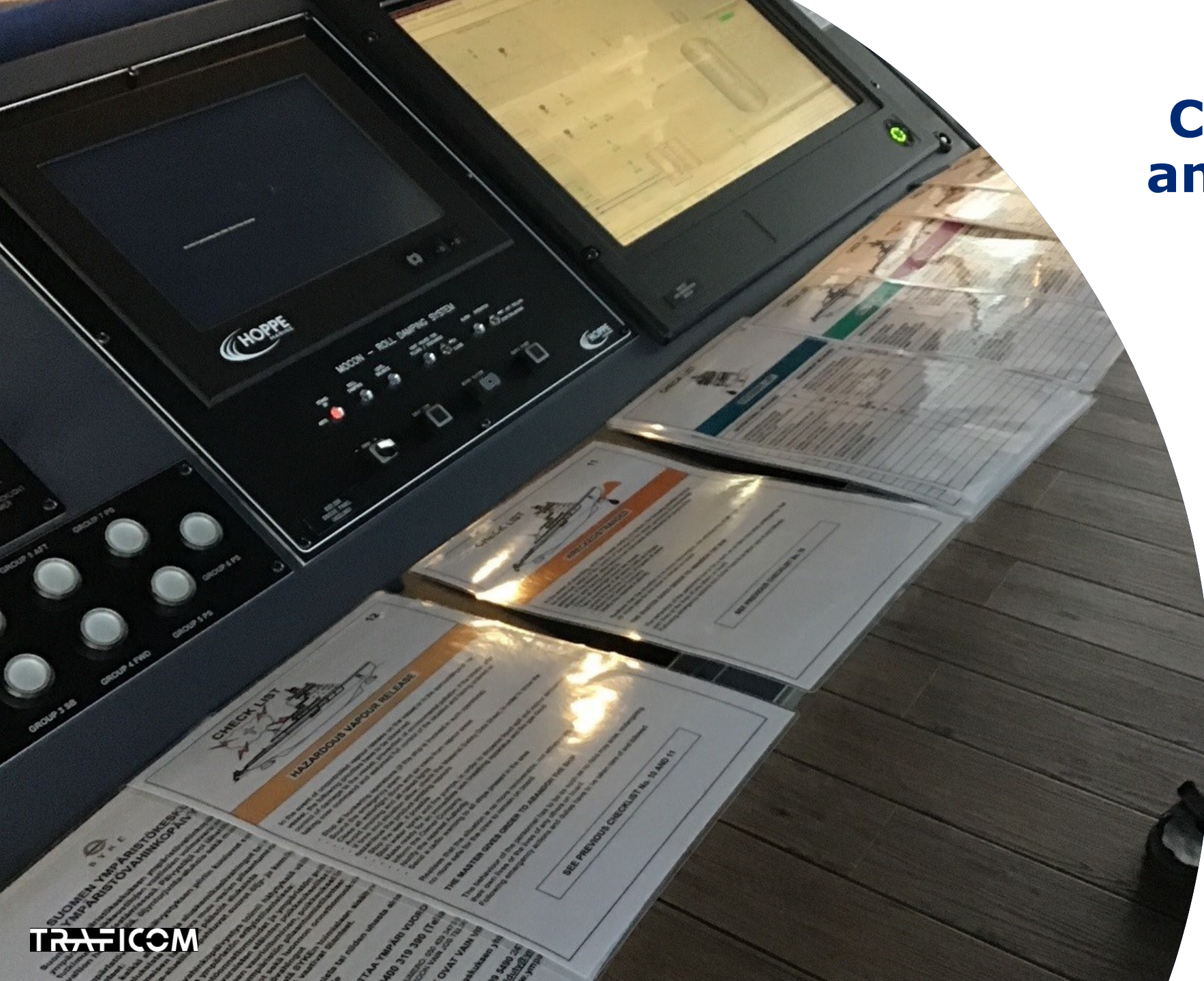
Register of Ships

- ▶ Finnish ships with a length of 15 m and upwards, engaged in merchant shipping must be registered in accordance with Register of Ships Act (512/1993).
- ▶ The registration districts are the Åland Islands and the rest of Finland.
- ▶ The Finnish Transport and Communications Agency maintains the transport register in accordance with Act on Transport Services (320/2017) whereas the State Department of Åland maintains a register of ships the home port of which is located in the Åland Islands.
- ▶ Provisions on the nationality of ships are laid down in the Maritime Act (674/1994).

Register of seafarers certificates and record of seagoing service

- ▶ The shipowner must report the seagoing service the seafarer performs on board a Finnish merchant vessel.
- ▶ The Transport Register also covers seafarers' certificates of competency, certificates of proficiency and endorsements (STCW reg. I/2.14).
- ▶ The registration of seafarers' seagoing service records is a Finnish national initiative provided for in Section 26c of the Act on Ships' Crews and the Safety Management of Ships (1687/2009).

Communication and reporting to the IMO



Communication and reporting to the IMO Principles

Agreed on in the
coordination meeting
4.10.2024

- ▶ Each party is responsible for reporting and communicating in accordance with its responsibilities.
- ▶ Part of the reporting and communication is done through GISIS.
- ▶ Part of the reporting is done through other channels.
- ▶ Traficom is the GISIS administrator and will grant the necessary access rights to use GISIS on request.
- ▶ A wide range of reporting and communication obligations are included in the conventions. It has therefore been decided to prioritise them as follows.
 - ▶ Firstly, it is decided that the reporting should continue to the extent that it is currently carried out.
 - ▶ As a next step, it is decided that every instance will go through the reporting obligations in the summary document and all to extend their own reporting as appropriate.

Communication and reporting to the IMO - Tiimeri

The screenshot shows the Tiimeri-tila web application interface. The browser address bar shows the URL: `tila.tiimeri.fi/sites/vn-imo_imsas_audit/_layouts/15/start.aspx#/Tiedostot/Forms/AllItems.aspx?RootFolder=%2Fsites%2Fvn-imo_imsas_audit%2FTiedostot%...`. The application header includes the Tiimeri-tila logo, navigation tabs (SELAA, TIEDOSTOT, KIRJASTO), and user information (Hanna Suutarla). The main content area displays a folder named "IMO IMSAS -audit" containing a sub-folder "Tiedostot" and a file "Raportointi IMOlle". Below this, a list of files is shown with columns for Name, Date Modified, Modified By, and Version. The files are:

Nimi	Muokattu	Muokkaaja	Versio
A 33-Res.1187 - 2023 NON-EXHAUSTIVE LIST OF OBLIGATIONS UNDER INSTRUMENTS RELEVANTTO THE IMO INSTRUMENTS I... (Secretary-General) (1)	3.10.2024 14.31	Hanna Suutarla	1.0
GISIS-yhteyshenkilö-2024	2.10.2024 17.03	Anne Miettinen	2.0
IMO-raportointi-01102024	3.10.2024 13.36	Hanna Suutarla	16.0
IMO-raportointi-periaatteet	3.10.2024 14.11	Hanna Suutarla	3.0

Annotations with arrows point to specific elements:

- A folder for IMO reporting (points to the "Tiedostot" folder)
- GISIS – list of accountable persons (points to the "GISIS-yhteyshenkilö-2024" file)
- The summary Excel covering the reporting responsibilities (points to the "IMO-raportointi-01102024" file)
- Reporting principles (points to the "IMO-raportointi-periaatteet" file)



Maritime culture

continual training
programme
national and regional drills
reward and incentive
mechanism

Continual training programme & national and regional drills

Regional and national drills on safety and pollution prevention

2023

2024

SAR (larger scale) RVL

45

46

OILREC (open sea areas) RVL

42

**XX (tulee
lokakuussa)**



MINISTRY OF TRANSPORT
AND COMMUNICATIONS

Economic Incentives

Common Areas

IMO IMSAS audit October 2024

Finnish reward and incentive mechanisms for shipping companies

- ▶ Economic incentives are seen to be the most effective way to encourage shipping companies to improve safety and commit to pollution prevention
- ▶ Hazards of **winter navigations** are tackled by the usage of Ice Classed Vessels
 - Those with the higher ice classes also have more propulsion power
 - Meaning more safe individual transit and less need for ice breaker assistance
 - To support the chartering/building of higher Ice Class Vessels, those vessels have **reduced fairway dues** & fewer restrictions on operating areas
- ▶ **Shallow waters and wide archipelago**
 - Supporting local knowledge OR usage of pilots
 - Pilotage Act

Fairway dues (Act 1122/2005)

The Act on Fairway Dues applies to ships engaged in merchant shipping in Finland's territorial waters.

Unit prices for fairway dues as of 1 January 2024, euro per net tonnage

Ice class	Cargo ship	Passenger ship
1A Super	0,470	0,625
1A	1,098	1,294
1B, 1C	2,578	2,358
II, III	4,381	4,169

Maximum amount for a single charge

- ▶ cargo vessel 53 875 euros
- ▶ passenger ship 16 215 euros
- ▶ cruise ship 22 250 euros.

Maximum number of annual payments

- ▶ an individual passenger ship pays for the first 30 port calls
- ▶ an individual cargo ship pays for the first 10 port calls

TullCustoms <https://arkisto.tulli.fi/en/businesses/transport-and-warehousing/fairway-dues>

Icebreaker assistance and restrictions

- ▶ The Finnish Transport Infrastructure Agency imposes assistance restrictions (traffic restrictions) for winter ports according to the ice situation.
- ▶ Icebreaker assistance is given to vessels which meet the issued ice class requirements for calling at the relevant port.
- ▶ Icebreaking services include the assistance of vessels in ice (“opened fairway”) and the related towing if needed (free of charge).

The Finnish Transport Infrastructure Agency

<https://vayla.fi/en/transport-network/waterways/winter-navigation>

Finland’s winter navigation – Instructions for winter navigation operators

Pilotage fee (Act 561/2023)

The Pilotage Act promotes maritime safety, navigational skills and prevention of environmental hazards.

- ▶ The pilotage fee is based on the tonnage of the vessel in question and the distance to be piloted.
- ▶ Exemptions to compulsory pilotage service are listed in the Pilotage Act (e.g. independent piloting license for crew operating regular traffic)

<https://finnpilot.fi/wp-content/uploads/2024/03/Pilotage-Fees-1.7.2024.pdf>



MINISTRY OF TRANSPORT
AND COMMUNICATIONS

Thank You.

Mr. Juha Tervonen

Chief Specialist

Ministerial Governance Department, Impact Assessment and
Development Unit

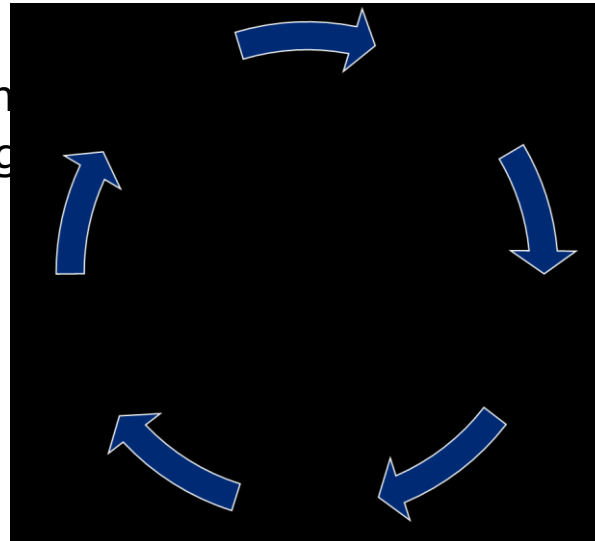
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Improvement

Improvement is build-in part of *the Policies on Procedures* -document

- ▶ The Policies on Procedures:
 - ▶ 1. describe the organisation and procedures to ensure that Finland fulfils its responsibilities and obligations as maritime administration
 - ▶ 2. define procedures to monitor and measure the implementation and enforcement of international regulation; and
 - ▶ 3. describe how the effectiveness and suitability of these policies are monitored, maintained and improved in order for the authorities to achieve the necessary level of flag, port and coastal State duties.
- ▶ The operations of the Maritime Administration are improved based on continuous monitoring and **an annual management review** established in this document



The scope of the annual maritime management review

1. changes in the operating environment
2. the status of conventions and their amendments, national implementation and promulgation, as well as legislative projects,
3. reviewing the statistical data of the maritime administration.
4. agency specific objectives and key processes to ensure the achievement of objectives and development needs,
5. the results of the self-assessments or internal audits of each agency and the status of possible corrective actions,
6. the results of external audits and status of any corrective actions,
7. any development proposals emerging from the operating environment or proposed by stakeholders,
8. key coordination meetings within maritime administration field and their measures
9. whether there is a need to update these Policies on procedures.

Improvement of the Maritime Administration - Tiimeri

The screenshot shows the 'Tiimeri-tila' web application interface. The top navigation bar includes 'Sivustot' and 'Tiimeri-tila' (circled in green). Below the navigation bar are tabs for 'SELAA', 'TIEDOSTOT', and 'KIRJASTO'. The main content area displays the title 'Merenkulun hallinnon katselmus 2024 - Poikkeamat 2024' and a file list. The file list has columns for 'Nimi', 'Muokattu', 'Muokkaaja', and 'Versio'. A green box highlights the title 'The annual management review 2024 - Non-conformities 2024'. Another green box highlights the first file name 'Observation - nro- annual management review'. A third green box highlights the last file name 'Poikkeamaseuranta-toinen-merenkulunhallinto-22082024'. A green arrow points from the title box to the first file name. A green arrow points from the first file name box to the last file name box. A green arrow points from the last file name box to the date '31/01/2025'. A green box at the bottom right contains the text 'Non-con monitoring sheet'.

VALTIONEUVOSTO
STATSRÅDET

IMO IMSAS -audit MUOKKAA LINKKEJÄ

Merenkulun hallinnon katselmus 2024 - Poikkeamat 2024

Uusi Lataa Synkronoi Jaa Lisää

Kaikki tiedot

The annual management review 2024 - Non-conformities 2024

Nimi	Muokattu	Muokkaaja	Versio
Havainto-10-merenkulunhallinnon katselmus-25012024			
Havainto-11-merenkulunhallinnon katselmus-25012024			
Havainto-12-merenkulunhallinnon katselmus-25012024	7.10.2024 14.07	<input type="checkbox"/> Hanna Suutarla	2.0
Havainto-13-merenkulunhallinnon katselmus-25012024	7.10.2024 14.09	<input type="checkbox"/> Hanna Suutarla	2.0
Havainto-14-merenkulunhallinnon katselmus-25012024	7.10.2024 14.44	<input type="checkbox"/> Hanna Suutarla	3.0
Havainto-7-merenkulunhallinnon katselmus-25012024	7.10.2024 13.59	<input type="checkbox"/> Hanna Suutarla	2.0
Havainto-8-merenkulunhallinnon katselmus-25012024	7.10.2024 14.01	<input type="checkbox"/> Hanna Suutarla	2.0
Havainto-9-merenkulunhallinnon katselmus-25012024	7.10.2024 14.01	<input type="checkbox"/> Hanna Suutarla	2.0
Poikkeamaseuranta-toinen-merenkulunhallinto-22082024	7.10.2024 14.46	<input type="checkbox"/> Hanna Suutarla	5.0

31/01/2025

Non-con monitoring sheet

Improvement: The non-con monitoring sheet - Tiimeri

	A	B	C	D	E	F	G	H	I	J
1										
2										
3		Raportin tyyppi / Report type	Numero / Number	Raportin nimi / Report name	Kehys / Frame work	Kuvaus / Description	Raportointi-päivä / Report date	Lähetetty vastuuhenkilölle pvm / Sent to responsible	Suljettu pvm / Closed date	
4		Havainto	4	IMO expertise	Katselmus / the annual maritime management review 2023	The review found that there is a lack of clarity in some areas of IMO work, preparation and reporting, and the flow of IMO documents within organisations. It was decided to organise joint IMO training, including GIS/S, to build an overview of the IMO process in terms of preparation and regulation and to promote the sharing of the guidelines among stakeholder networks. The 2024 Review concluded. . . that many organisational changes are underway, which will also affect the delivery of the necessary IMO training (2023 observation 4).	25.1.2024	2.2.2024		
5		Havainto	6	Administrative interpretations (to the satisfaction)	Katselmus / the annual maritime management review 2023	"No evidence was provided on the interpretations (to the satisfaction of the Administration) --> interpretation (order) guidelines will be developed by Traficom."	25.1.2024	2.2.2024		
6		Havainto	7	Maritime administration cooperation groups - shortcomings in the list	Katselmus / the annual maritime management review 2024	1. Add the Marine Environment Network to the cooperation networks 2. Add the IMO Coordination Groups as separate lines in the cooperation networks	22.8.2024	7.10.2024		
7		Havainto	8	Slowness/deficiencies in the reporting process of IMO resolutions	Katselmus / the annual maritime management review 2024	Agree on a timeframe for Traficom to submit resolution reports between Traficom and LVM	22.8.2024	7.10.2024		
8		Havainto	9	Gaps in general understanding of IMO work / tasks and stages of IMO influence	Katselmus / the annual maritime management review 2024	The general process diagram of international influence is drawn as a sub-process of the legislative process (monster diagram)	22.8.2024	7.10.2024		
9		Havainto	10	Changes in governance resources	Katselmus / the annual maritime management review 2024	Recognition of the thinning of resources at ELY and Traficom, and noting the new resource for the SM Rescue Department	22.8.2024	7.10.2024		
		Havainto		Loose terminology related to IMSAS responsibilities	Katselmus / the annual					

Kiitos