

TRAFICOM

Finnish Transport and Communications Agency

IMSAS – auditoinnin koordinaatio- ryhmä

25.11.2024



Agenda

1. Kokouksen avaus/ Anne Miettinen LVM
2. Keskustelu auditointikokemuksista/ kaikki
3. Alustus auditointihavainnoista/ Hanna Suutarla Traficom
4. Jatkovalmistelu ja hankesuunnitelman päivitys
5. Mahdolliset muut asiat
 - ▶ Karonkka 15.01.2025
6. Seuraava kokous
7. Kokouksen päätös



Alustus auditointi- havainnoista

Auditointihavainnot ja seuraava askeleet

- ▶ Perehdytään havaintoihin
- ▶ Sovitaan juurisyyanalyysin metodiikka
- ▶ Suoritetaan yhteinen juurisyyanalyysi [kokous 1]
→ toimijakohtaiset jatkoanalyysit
- ▶ Päätetään yhteiset/yhdessä korjaavat toimenpiteet [kokous 2]
→ toimijakohtaiset toteutus suunnitelmat
- ▶ Raportoidaan IMO:lle – DL maaliskuu 2025
- ▶ Aloitetaan korjaavat toimenpiteet
- ▶ Merenkulkuhallinnon katselmus

FORM A → FORM B

(Form A)

FINDINGS/OBSERVATIONS NOTICE	
Member State: Finland	Audit period: 28/10/2024 to 4/11/2024
Department: Traficom	
Finding No.: FD-1	Observation No.:
<p>STATEMENT:</p> <p>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> <p>EVIDENCE:</p> <p>Examples: Specimen of certificates, list of parties recognised under STCW, some of the text of laws/regulations were not communicated to IMO.</p>	
<p>APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:</p> <p>SOLAS 1974, article III</p> <p>"Communication of information"</p> <p>III Code, paragraph 9</p> <p>"Communication of information - The State shall communicate its strategy, as referred to in paragraph 3, including information on its national legislation to all concerned"</p>	
Team leader: Prasad Panicker	Date: 1/11/2024
Member State: Finland	Date received:

Form B

CORRECTIVE ACTION	
Member State: [REDACTED]	Audit Period: 15 to 24 A [REDACTED]
Department: [REDACTED]	Team leader: P. Lenard
Finding No.: FD-1	Observation No.:
<p>Root Cause:</p> <p>The following root causes led to the finding:</p> <ol style="list-style-type: none"> .1 there was a lack of awareness on the extent and level of IMO reporting requirements through GISIS; and .2 the responsibility for submitting mandatory information and reports to IMO was not clearly defined and established. 	
<p>Corrective Action:</p> <p>The maritime administration will implement the following actions:</p> <ol style="list-style-type: none"> .1 assign responsibilities for each mandatory reporting requirement to IMO; .2 establish a general procedure for uploading documentation to GISIS to assist reporters; .3 monitor reporting requirements through the IMO Web Accounts Administrator and circulate reporting information reminders, if necessary; and .4 add mandatory reporting updates as a standing agenda item of the National Maritime Steering Committee. 	
<p>Proposed target completion date: 31 December 2024</p>	



**Findings -
Observations -
Areas for further
development -
Areas of positive
development**

FD-1 - Communication of information to IMO

▶ STATEMENT:

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)

▶ EVIDENCE:

▶ Examples: Specimen of certificates, list of parties recognised under STCW, some of the text of laws/regulations were not communicated to IMO.

▶ APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:

▶ SOLAS 1974, article III "Communication of information"

▶ III Code, paragraph 9 "Communication of information - The State shall communicate its strategy, as referred to in paragraph 3, including information on its national legislation to all concerned"

FD-2 - Left to the satisfaction of the administration

▶ STATEMENT:

Although the Administration had developed a policy for those requirements that were “left to the satisfaction of the administration” contained in mandatory IMO instruments, it was evident that interpretations had not been developed or documented for some of such provisions under the mandatory IMO instruments.

▶ EVIDENCE:

- ▶ 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 above below 150 GT/400GT as per MARPOL annex I, reg 6.2).

▶ APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:

- ▶ 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"

FD-3 - Inspections of the ships flying the flag

▶ STATEMENT:

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.

▶ EVIDENCE:

▶ 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.

▶ APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:

▶ 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"

FD-4 - Documented system for qualification for the personnel

▶ STATEMENT:

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.

▶ EVIDENCE:

- ▶ 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.

▶ APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:

- ▶ III Code, paragraph 33: "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"
- ▶ III Code, paragraph 35 "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"

FD-5 – Review of the traffic separation scheme (Aland Sea)

▶ STATEMENT:

The maritime administration did not review the existing traffic separation scheme in accordance with the guidelines and criteria stipulated in SOLAS regulation V/10.8, since its inception.

▶ EVIDENCE:

- ▶ The existing Aland Sea traffic separation scheme (TSS) was established in 2010. The TSS had not been reviewed in accordance with the guidelines and criteria as per SOLAS V/10.8 since 2010.

▶ APPLICABLE PROVISIONS OF THE AUDIT STANDARD AND/OR IMO INSTRUMENT:

- ▶ SOLAS 1974, regulation V/10 "Ships' routing"
- ▶ III Code, paragraph 49 "Enforcement - Coastal States shall take all necessary measures to ensure their observance of international rules when exercising their rights and fulfilling their obligations"

Areas for further development – AFD 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”.

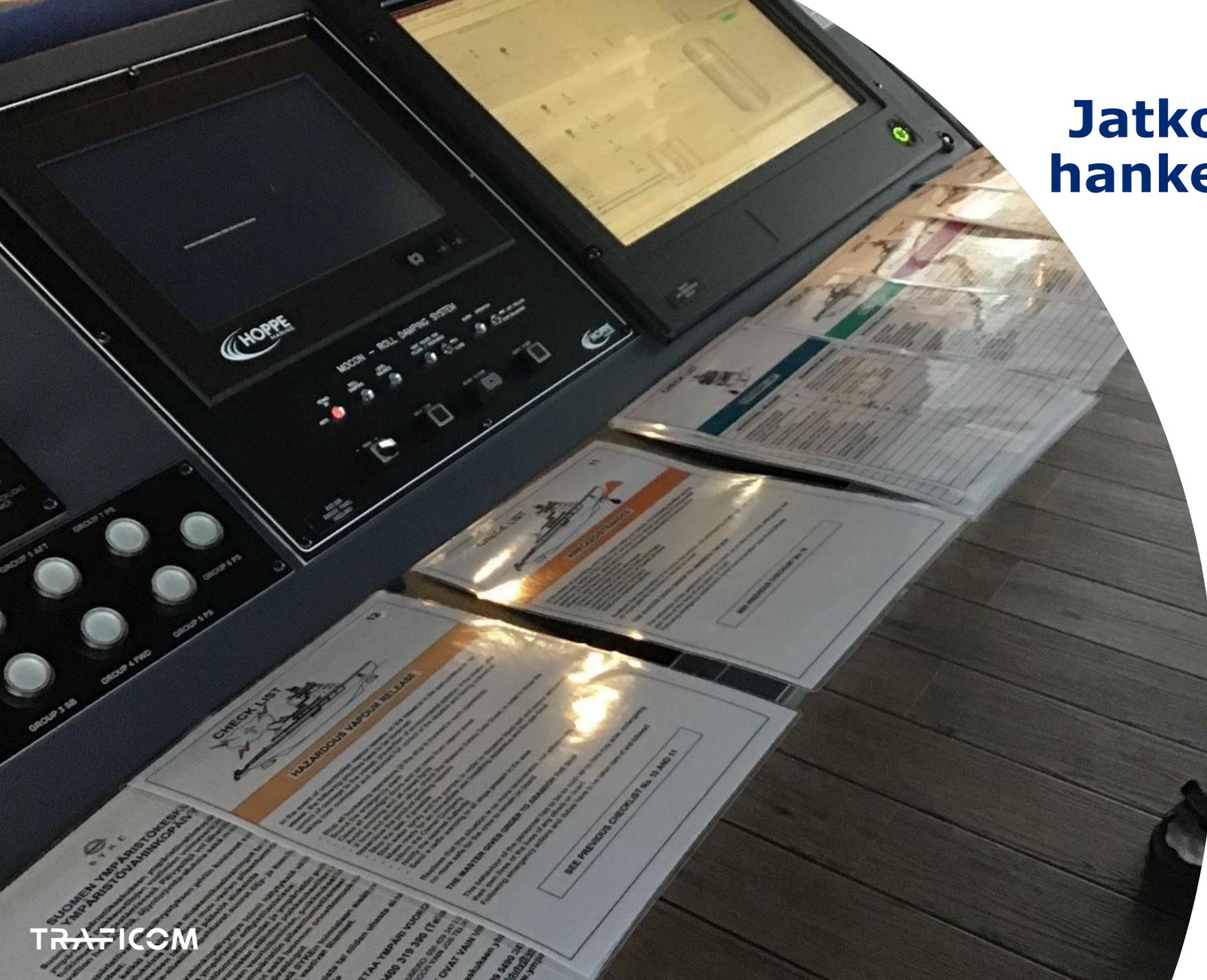
Areas for further development – AFD 2

- ▶ The State had a policy of conducting random checks for detection of violation of the verification of gross mass of containers and 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 too low in comparison to the number of containers handled by the ports (approximately 400,000 containers are handled by ports all over the country every year).

Areas of positive development – APD 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.

Jatkovalmistelu ja hanke suunnitelman päivitys



Kiitos