



CIRCULAR no 20

Our ref 16.12.2025 nr 17.1-1/24

Transfer of Ships to the Estonian Ship Registry – Guidance in Cases of State Interpretation

To Recognized Organizations (RO) and
security organizations for guidance and to
shipowners, ship managers and masters for
information and guidance

In accordance with the Agreement concluded between the Transport Administration of the Republic of Estonia and RO, and pursuant to the Agreement, Estonian Transport Administration hereby provides guidance (Annexed to this Circular) in cases where legal interpretation is left to the discretion of the Flag State, as well as in cases involving the transfer of ships to the Estonian ship registry, as outlined below:

Transfer of Ships to the Estonian Registry

1. European Union Ships

1. The provisions of **Regulation (EC) No. 789/2004**, as amended, are applicable to ships transferring from another European Union Member State to the Estonian registry.
2. The statutory full-term certificates, issued in compliance with the relevant international conventions or in accordance Directive 2009/45/EC of the European Parliament and of the Council of 6 May 2009 on safety rules and standards for passenger ships, will be recognised by the Estonian Transport Administration.
3. Upon transfer, if the ship has RO, then they are authorized to carry out a survey to verify that the ship's condition, equipment, and on board procedures comply with the requirements as stipulated in the statutory certificates. Any granted/ issued exemption has to be submitted to Estonian Transport Administration for review, to confirm that it has been issued in accordance with applicable international convention. Any condition or waiver continue to apply if issued in accordance with international convention. In case of significant discrepancies, the RO shall consult the Estonian Transport Administration for further instructions.
4. Provided the outcome of the survey is satisfactory and dependent on the status of ongoing surveys, the existing certificates can be reissued behalf Republic of Estonia.
5. All plans and documents that require approval by the Administration, in accordance with international conventions, shall be clearly endorsed by the RO as: **“Approved on behalf of the Government of Estonia.”**

2. Convention Ships from Outside the European Union

1. The Estonian Transport Administration will, as a general principle, recognise statutory full-term certificates issued in accordance with international conventions.
2. Upon transfer, the RO shall conduct a survey to confirm that the ship's condition, equipment, and onboard procedures comply with the specifications of the valid certificates and review about status of exemptions. Any granted/ issued exemption has to be submitted to Estonian Transport Administration for review, to confirm that it been issued in accordance with applicable international convention. Any condition or waiver continue to apply if issued accordance international convention. In case of significant deviations, the RO shall notify the Administration for further guidance.
3. Subject to a satisfactory outcome of the verification and based on the status of current surveys, the certificates may be reissued under the authority of the Government of Estonia with same conditions taking account harmonized system of survey and certification.
4. All plans and documents required by the conventions to be approved by the Administration must be clearly marked by the RO as: **“Approved on behalf of the Government of Estonia.”**

This circular is available on the Estonian Transport Administration website under Estonian Transport Administration's Circulars to the maritime sector.

(Digitally signed)
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Annex: Interpretations regarding implementation of international statutory requirements which contain references “to the satisfaction of the Administration“

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