



REPUBLIC OF ESTONIA  
TRANSPORT ADMINISTRATION

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Your ref 15.06.2026

Our ref 19.06.2026 nr 17.1-3/26/10847-1

**Ship structure (building No. 90254) – sill  
height compliance assessment**

Dear Mr Pill,

This letter concerns the ship structure with building number 90254.

The Estonian Transport Administration provides the following position regarding certain door sill heights that do not comply with the International Convention on Load Lines (ICLL), as amended in 2003 (Annex I, Regulation 12(3)).

The Administration has assessed the deviations and considers them acceptable under the following conditions and justifications:

- Doors No. 101 (sill height 115 mm) and No. 102 (sill height 120 mm), located as external doors of the wet laboratory on the freeboard deck, are accepted on the following conditions:
  - The internal doors within the same space (No. 105 and No. 106), each with a sill height of 230 mm, are deemed sufficient, taking into account the excess freeboard (158 mm, as determined by the freeboard calculation), which compensates for the deficiency in accordance with Annex I, Regulation 2(5) of the ICLL;
  - The wet laboratory space is not included in the vessel's stability calculations.
- Doors No. 103 (sill height 230 mm), No. 204 (sill height 320 mm), and No. 113 (sill height 250 mm) located on the freeboard deck are considered acceptable, as the excess freeboard compensates for the deviation in accordance with Annex I, Regulation 2(5) of the ICLL.
- Door No. 104 (sill height 60 mm) is accepted on the condition that the corresponding space is not included in the vessel's stability calculations.

This assessment is made in accordance with the applicable provisions of the International Convention on Load Lines (ICLL), taking into account the documented freeboard calculations and

the functional characteristics of the respective spaces.

Yours sincerely

(Digitally signed)

Jan Jaanson

Head of Shipping Department

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