Annex **Circular No 20 ver 01**

Estonian Transport Administration

Interpretations regarding implementation of international statutory requirements which contain references "to the satisfaction of the Administration"

Paragraph 16.5 of IMO III Code [Resolution A1070(28): IMO Instruments Implementation Code] states that a Flag State while administering a safety and environmental protection programme provide guidance concerning those requirements found in the relevant international instruments that are to the satisfaction of the Administration.

The Estonian Transport Administration (hereby TRAM) has addressed the stated requirement of guidance on "to the satisfaction of the Administration" in the Agreement with Recognized Organization in the paragraphs 4.2 and 5.2-5.3 which state:
"Functions in accordance with special (additional) authorization for services outside the scope of the Appendix to this Agreement will be dealt with as mutually agreed on a case-by-case basis. While interpretations of the applicable instruments, as well as the determination of equivalents or the acceptance of substitutes to the requirements of the applicable instruments are the prerogative of the Administration, the Recognized Organization will cooperate in their establishment as necessary and shall decide on interpretations and equivalents within the framework of the Agreement and according to the following hierarchy of rules and guidances:
a) Estonian legislation;
b) resolutions, circulars and other statutory documents issued by the IMO;
c) regulations, interpretations and other communications issued by the European Union;
d) procedures, procedural requirements, unified requirements and unified interpretations issued by International Association of Classification Societies (hereby Rules of IACS) and Recognised Organisation requirements for the design, construction, equipment, maintenance and survey of ships (hereby RO rules and procedures)
e) orders, regulations, interpretations and circulars, etc. issued by the Administration.

Exemptions and deviations from, and equivalents to, the requirements of the applicable instruments are the prerogative of the Administration and must be approved by the Administration prior to issuance.
In instances where, temporarily the requirements of an applicable instrument cannot be met under particular circumstance. Then proposals for such measures or supplementary equipment as may be available to permit the ship to proceed to a suitable port where permanent repairs or rectifications can be effected or replacement equipment fitted, are to be acceptable to the Recognized Organization and agreed by the Administration.

Whilst the purpose of this guidance is to further provide instructions on the arrangements that are to be "to the satisfaction of the Administration" it is recognized that this is not appropriate to provide prescriptive guidance or instruction for all requirements due to the number of factors that have to be taken into consideration. In such cases, the technical justification for acceptance will be considered by TRAM on a case-by-case basis. For delegated items these should be supported by the Recognized Organization in the first instance.

SOLAS		
Regulation, Item	**Paragraph text**	**TRAM Guidance**
II-1/3-6/2.3	The construction and materials of all means of access and their attachment to the ship's structure shall **be to the satisfaction of the Administration**. The means of access shall be subject to survey prior to, or in conjunction with, its use in carrying out surveys in accordance with regulation I/10.	As general means of access and openings on the oil tankers of more than 500 gross tons and on the bulk carriers of more than 20000 gross tones should be in accordance with Rules of IACS which should comply with requirements as set in IMO Resolutions MSC. 134(76), MSC. 158(78), MSC. 151(78).
II-1/3-6/5.3	For oil tankers of less than 5,000 tonnes deadweight, **the Administration may approve**, in special circumstances, smaller dimensions for the openings referred to in paragraphs 5.1 and 5.2, if the ability to traverse such openings or to remove an injured person can be proved **to the satisfaction of the Administration**.	In compliance with the Rules of IACS and RO rules and procedures. Means of access and openings on the oil tankers of more than 500 gross tons and on the bulk carriers of more than 20000 gross tones should comply with requirements as set in IMO Resolutions MSC. 134(76), MSC. 158(78), MSC. 151(78), MSC.194(80)
II-1/5/2	**The Administration may allow** the inclining test of an individual cargo ship to be dispensed with provided basic stability data are available from the inclining test of a sister ship and it is shown **to the satisfaction of the Administration** that reliable stability information for the exempted ship can be obtained from such basic data, as required by regulation 5-1.A weight survey shall be carried out upon completion and the ship shall be inclined whenever in comparison with the data derived from the sister ship, a deviation from the lightship displacement exceeding 1% for ships of 160 m or more in length and 2% for ships of 50 m or less in length and as determined by linear interpolation for intermediate lengths or a deviation from the lightship longitudinal centre of gravity exceeding 0.5% of Ls is found.	In compliance with the Rules of IACS and RO rules and procedures. • MSC/Circ.1158 – Unified Interpretation SOLAS II-1; and • 2008 IS CODE, Part B, Chapter 8, Sec.8.1 • MSC.1/Circ.1281
II-1/5-1/1	The master shall be supplied with such information satisfactory to the Administration as is necessary to enable him by rapid and simple processes to obtain accurate guidance as to the stability of the ship under varying conditions of service. A copy of the stability information **shall be furnished to the Administration**.	In compliance with the Rules of IACS and RO rules and procedures. Stability Information is developed on basis of the following IMO requirements: • MSC/Circ.456 – Guidelines for the preparation of intact stability information. • MSC/Circ.706 – Guidance on intact stability of existing tankers during transfer operations. • MSC.1/Circ.1228 – Revised guidance to the master for avoiding dangerous situations in following and quartering seas. • MSC 267(85) – Adoption of the International Code on Intact Stability, 2008 • Regulation 10 of International Convention on Load Lines

II-1/13/6.1	*Each power-operated sliding watertight door:* *.1 shall have a vertical or horizontal motion;* *.2 shall, subject to paragraph 9, be normally limited to a maximum clear opening width of 1.2 m.* *The Administration may permit larger doors only to the extent considered necessary for the effective operation of the ship provided that other safety measures, including the following, are taken into consideration:* *.1 special consideration shall be given to the strength of the door and its closing appliances in order to prevent leakages; and* *.2 the door shall be located inboard the damage zone B/5;* *.3 shall be fitted with the necessary equipment to open and close the door using electric power, hydraulic power or any other form of power that is acceptable to the Administration;* *.4 shall be provided with an individual hand-operated mechanism. It shall be possible to open and close the door by hand at the door itself from either side, and in addition, close the door from an accessible position above the bulkhead deck with an all-round crank motion or some other movement providing the same degree of safety acceptable to the Administration. Direction of rotation or other movement is to be clearly indicated at all operating positions. The time necessary for the complete closure of the door, when operating by hand gear, shall not exceed 90 s with the ship in the upright position. Visual indicators to show whether the door is open or closed shall be provided at the accessible position above the bulkhead deck*	*In compliance with the Rules of IACS and RO rules and procedures.* • *Res.MSC.474(102)*
II-1/13/6.6	*The enclosures of electrical components necessarily situated below the bulkhead deck shall provide suitable protection against the ingress of water.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *Res.MSC.474(102)* • *publication IEC 60529:2003:* *.1 electrical motors, associated circuits and control components; protected to IPX 7 standard;* *.2 door position indicators and associated circuit components; protected to IPX 8 standard;* *.3 door movement warning signals; protected to IPX 6 standard.* *Other arrangements for the enclosures of electrical components may be fitted provided* ***the Administration is satisfied*** *that an equivalent protection is achieved. The water pressure IPX 8 shall be based on the pressure that may occur at the location of the component during flooding for a period of 36 h.*
II-1/13/8.1	*If* ***the Administration is satisfied*** *that such doors are essential, watertight doors of satisfactory construction may be fitted in watertight bulkheads dividing cargo spaces on 'tween decks. Such doors may be hinged, rolling or sliding doors but shall not be remotely controlled. They shall be fitted at the highest level and as far from the shell plating as practicable, but in no case shall the outboard vertical edges be situated at a distance from the shell plating which is less than one fifth of the breadth of the ship, as defined in regulation 2, such distance being measured at right angles to the*	*In compliance with the Rules of IACS and RO rules and procedures.* • *.MSC.474(102)* • *publication IEC 60529:2003:* *.1 electrical motors, associated circuits and control components; protected to IPX 7 standard;* *.2 door position indicators and associated circuit components; protected to IPX 8 standard;* *.3 door movement warning signals; protected to IPX 6 standard.*

	centreline at the level of the deepest subdivision draught. *8.2 Should any such doors be accessible during the voyage, they shall be fitted with a device which prevents unauthorized opening. When it is proposed to fit such doors, the number and arrangements shall receive the* ***special consideration of the Administration****.* *9 Portable plates on bulkheads shall not be permitted except in machinery spaces.* ***The Administration may permit*** *not more than one power-operated sliding watertight door larger than those specified in paragraph 6.1.2 to be substituted for these portable plates in each watertight bulkhead, provided these doors are intended to remain closed during navigation except in case of urgent necessity at the discretion of the master. These doors need not meet the requirements of paragraph 6.1.4 regarding complete closure by hand-operated gear in 90 s.* *10.2 Where it is proposed to fit tunnels piercing watertight bulkheads, these shall receive the* ***special consideration of the Administration****.*	*Other arrangements for the enclosures of electrical components may be fitted provided that an equivalent protection is achieved. The water pressure IPX 8 shall be based on the pressure that may occur at the location of the component during flooding for a period of 36 h.*
II-1/13/7.1.3 *On or after 01.01.2024*	*Each power-operated sliding watertight door shall be fitted with the necessary equipment to open and close the door using electric power, hydraulic power, or any other form of power that* ***is acceptable to the Administration****;* *Note: Not Applicable for Hydraulic Power Sliding Watertight Doors*	*In compliance with the Rules of IACS and RO rules and procedures and shall be of a strength equivalent to that of the subdivision bulkheads in which they are fitted.* • *Res.MSC.474(102)* • *Inspection Guidelines on Manual Operated Watertight Doors Sealing Arrangements:* *-visual inspection of rubber gaskets with respect to wear, aging, hardening, distortion;* *-replacement due to maker's lifespan recommendation or resulting from visual inspection, as there could be cracks due to ageing or hardening etc.* *-cleanliness (surface shall not be painted over);* *-greasing of surface;* *-visual inspection of the packing retaining channels.*
II-1/15/2	*The arrangement and efficiency of the means for closing any opening in the shell plating shall be consistent with its intended purpose and the position in which it is fitted and generally* ***to the satisfaction of the Administration****.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC/Circ.755*
II-1/15/8.5	*All shell fittings and valves required by this regulation shall be of steel, bronze or other approved ductile material. Valves of ordinary cast iron or similar material are not acceptable. All pipes to which this regulation refers shall be of steel or other equivalent* ***material to the satisfaction of the Administration****.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1/Circ.1369*
II-1/16/1.1	*The design, materials and construction of all watertight doors, sidescuttles, gangway and cargo ports, valves, pipes, ash-chutes and rubbish-chutes referred to in these regulations shall be* ***to the satisfaction of the Administration***	*The design, materials and construction of all watertight doors, sidescuttles, gangway and cargo ports etc shall be in accordance with the Rules of IACS and RO rules and procedures.* *All shall be constructed in such a manner that it shall be capable of supporting with a proper manner of resistance, the pressure of water and remain watertight at corresponding levels.*
II-1/16-1/1	*Watertight decks, trunks, tunnels, duct keels and ventilators shall be of the same strength as watertight bulkheads at corresponding levels. The means used for making them watertight, and the arrangements adopted for closing*	*The design, materials and construction of all watertight decks, trunks, tunnels, duct keels and ventilators shall be in accordance with the Rules of IACS and RO rules and procedures.*

	*openings in them, shall be **to the satisfaction of the Administration**. Watertight ventilators and trunks shall be carried at least up to the bulkhead deck in passenger ships and up to the freeboard deck in cargo ships.*	
II-1/20/2	*Water ballast should not in general be carried in tanks intended for oil fuel. In ships in which it is not practicable to avoid putting water in oil fuel tanks, oily-water separating **equipment to the satisfaction of the Administration** shall be fitted, or other alternative means, such as discharge to shore facilities, **acceptable to the Administration** shall be provided for disposing of the oily-water ballast.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *.MSC.421(98)* • *Refer to Annex I – Regulations for the Prevention of Pollution by Oil.* - *Part C – Control of Operational Discharge of Oil* - *Regulation 16 – Segregation of oil and water ballast and carriage of oil in forepeak tanks*
II-1/29/1	*Unless expressly provided otherwise, every ship shall be provided with a main steering gear and an auxiliary steering gear **to the satisfaction of the Administration**. The main steering gear and the auxiliary steering gear shall be so arranged that the failure of one of them will not render the other one inoperative.*	*The main steering gear and axillary steering gear are to comply with requirements of SOLAS Ch. II1/Reg.29.3 and 29.4.* • *MSC. 1/Circ.1583* • *MSC.1/Circ.1416/Rev.1* *Non-traditional steering gear may comply with the Rules of IACS and RO rules and procedures.*
II-1/29/2.1	*All the steering gear components and the rudder stock shall be of sound and reliable **construction to the satisfaction of the Administration**. Special consideration shall be given to the suitability of any essential component which is not duplicated. Any such essential component shall, where appropriate, utilize anti-friction bearings such as ball bearings, roller bearings or sleeve bearings which shall be permanently lubricated or provided with lubrication fittings.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1/Circ.1583* • *MSC.1/Circ.1416/Rev.1*
II-1/29/6.3	*Steering gears, other than of the hydraulic type, shall achieve standards equivalent to the requirements of this paragraph **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.*
II-1/41/4	*Where the total installed electrical power of the main generating sets is in excess of 3 MW, the main busbars shall be subdivided into at least two parts which shall normally be connected by removable links or other approved means; so far as is practicable, the connection of generating sets and any other duplicated equipment shall be equally divided between the parts. Equivalent arrangements may be permitted **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.*
II-1/42/1.3	*The location of the emergency source of electrical power and associated transforming equipment, if any, the transitional source of emergency power, the emergency switchboard and the emergency electric lighting switchboards in relation to the main source of electrical power, associated transforming equipment, if any, and the main switchboard shall be such as to **ensure to the satisfaction of the Administration** that a fire or other casualty in spaces containing the main source of electrical power,associated transforming equipment, if any, and the main switchboard or in any machinery space of category A will not interfere with the supply, control and distribution of emergency electrical power. As far as practicable, the space containing the emergency source of electrical power, associated*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1/Circ.736*

	transforming equipment, if any, the transitional source of emergency electrical power and the emergency switchboard shall not be contiguous to the boundaries of machinery spaces of category A or those spaces containing the main source of electrical power, associated transforming equipment, if any, or the main switchboard.	
II-1/43/1.3	*The location of the emergency source of electrical power, associated transforming equipment, if any, the transitional source of emergency power, the emergency switchboard and the emergency lighting switchboard in relation to the main source of electrical power, associated transforming equipment, if any, and the main switchboard shall be such as to ensure **to the satisfaction of the Administration** that a fire or other casualty in the space containing the main source of electrical power, associated transforming equipment, if any, and the main switchboard, or in any machinery space of category A will not interfere with the supply, control and distribution of emergency electrical power. As far as practicable the space containing the emergency source of electrical power, associated transforming equipment, if any, the transitional source of emergency electrical power and the emergency switchboard shall not be contiguous to the boundaries of machinery spaces of category A or those spaces containing the main source of electrical power, associated transforming equipment, if any, and the main switchboard.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1/Circ.736* • *MSC.1/Circ.1464/Rev.1*
II-1/45/1.2	***The Administration may require** additional precautions for portable electrical equipment for use in confined or exceptionally damp spaces where particular risks due to conductivity may exist. 2 Main and emergency switchboards shall be so arranged as to give easy access as may be needed to apparatus and equipment, without danger to personnel. The sides and the rear and, where necessary, the front of switchboards shall be suitably guarded. Exposed live parts having voltages to earth exceeding a voltage **to be specified by the Administration** shall not be installed on the front of such switchboards. Where necessary, non-conducting mats or gratings shall be provided at the front and rear of the switchboard.* *3.2 The requirement of paragraph 3.1 does not preclude under conditions **approved by the Administration** the use of:* *.1 impressed current cathodic protective systems;* *.2 limited and locally earthed systems; or* *.3 insulation level monitoring devices provided the circulation current does not exceed 30 mA under the most unfavourable conditions.* *3.3 Where the hull return system is used, all final subcircuits, i.e. all circuits fitted after the last protective device, shall be two-wire and special precautions shall be taken **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.* *Compliance with Electrical Standards referred by IEC (IEC 60092 standards)*
II-1/45/5.4	*Where cables which are installed in hazardous areas introduce the risk of fire or explosion in the event of an electrical fault in such areas, special precautions against such risks shall be taken **to the satisfaction of the***	*In compliance with the Rules of IACS and RO rules and procedures.*

	Administration.	
II-1/45/9.3	*Accumulator batteries shall not be located in sleeping quarters except where hermetically sealed **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1/Circ.736*
II-1/45/11	*11 In tankers, electrical equipment, cables and wiring shall not be installed in hazardous locations unless it conforms with standards not inferior to those acceptable to the Organization.[1] However, for locations not covered by such standards, electrical equipment, cables and wiring which do not conform to the standards may be installed in hazardous locations based on a risk assessment **to the satisfaction of the Administration**, to ensure that an equivalent level of safety is assured.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1/Circ.170(79)*
II-1/46/2	*Measures shall be taken **to the satisfaction of the Administration** to ensure that the equipment is functioning in a reliable manner and that satisfactory arrangements are made for regular inspections and routine tests to ensure continuous reliable operation.*	*Recognized Organizations should consider case-by-case instructions of TRAM and Estonian legislation (Maritime Safety Act Chapter 3) in relevant field and IEC 60092 standards when developing normative documents aimed to supervise fulfilment of the SOLAS Convention requirements.*
II-1/46/3	*Every ship shall be provided with documentary evidence**, to the satisfaction of the Administration**, of its fitness to operate with periodically unattended machinery spaces.*	*In compliance with the Rules of IACS and RO rules and procedures and Estonian legislation (Maritime Safety Act Chapter 3)*
II-1/53/1	*The special requirements for the machinery, boiler and electrical installations shall be to the satisfaction of the Administration and shall include at least the requirements of this Regulation.*	*In compliance with the Rules of IACS and RO rules and procedures and Estonian legislation (Maritime Safety Act § 19[1] Requirements for installation and placing on market of safety equipment of ships).*
II-2/1.6.2.1.2	*The type of foam concentrates for use in chemical tankers shall be **to the satisfaction of the Administration** taking into account the guidelines developed by the Organization;*	*MSC.1/Circ.1312 and Corr.1 (Refer to Paragraph 3)* *-For foam concentrate type approval, the tests under paragraphs 3.1 to 3.14 below should be performed by the foam concentrate manufacturer at laboratories acceptable to the Recognized Organization*
II-2/1.6.6	*Chemical tankers and gas carriers shall comply with the requirements for tankers, except where alternative and supplementary arrangements are provided **to the satisfaction of the Administration**, having due regard to the provisions of the International Bulk Chemical Code and the International Gas Carrier Code, as appropriate.*	*In compliance with the Rules of IACS and RO rules and procedures.* *Chemical tankers and gas carriers complying with the provisions of the International Bulk Chemical Code and the International Gas Carrier Code are considered as complying with the requirements for tankers carrying crude oil or petroleum products having a flashpoint not exceeding 60°C* *Ships constructed after 1986 carrying substances identified in chapter 17 of the IBC Code must follow the requirements for design, construction, equipment and operation of ships contained in the Code.* *Ships subject to the Code shall be designed to one of the following standards:* • *A type 1 ship is a chemical tanker intended to transport chapter 17 products with very severe environmental and safety hazards which require maximum preventive measures to preclude an escape of such cargo.* • *A type 2 ship is a chemical tanker intended to transport chapter 17 products with appreciably severe environmental and safety hazards which require significant preventive measures to preclude an escape of such cargo.* • *A type 3 ship is a chemical tanker intended to transport chapter 17 products with sufficiently severe environmental and safety hazards which require a moderate degree of containment to increase survival capability in a damaged condition.*

		Thus, a type 1 ship is a chemical tanker intended for the transportation of products considered to present the greatest overall hazard and type 2 and type 3 for products of progressively lesser hazards.Accordingly, a type 1 ship shall survive the most severe standard of damage and its cargo tanks shall be located at the maximum prescribed distance inboard from the shell plating. Code for the Construction Equipment of Ships Carrying Dangerous Chemicals in Bulk (BCH Code). Under regulation 11 of MARPOL Annex II , chemical tankers constructed before 1 July 1986 must comply with the requirements of the Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (BCH Code) – the predecessor of the IBC Code. The BCH Code remains as a recommendation under the 1974 SOLAS Convention.
II- 2/4.2.2.5.1	*Oil fuel pipes and their valves and fittings shall be of steel or other approved material, except that restricted use of flexible pipes shall be permissible in positions where **the Administration is satisfied** that they are necessary.[2] Such flexible pipes and end attachments shall be of approved fire-resisting materials of adequate strength and shall be constructed to the satisfaction of the Administration. For valves, fitted to oil fuel tanks and which are under static pressure, steel or spheroidal-graphite cast iron may be accepted. However, ordinary cast iron valves may be used in piping systems where the design pressure is lower than 7 bar and the design temperature is below 60 degrees C.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *ISO 15540 & 15541* *Hose clamps and similar types of attachments for flexible pipes are not permitted.*
II-2/4.5.1.4.4	*In combination carriers only: …4 Where cargo wing tanks are provided, cargo oil lines below deck shall be installed inside these tanks. However, **the Administration may permit** cargo oil lines to be placed in special ducts provided there are capable of being adequately cleaned and ventilated **to the satisfaction of the Administration**. Where cargo wing tanks are not provided, cargo oil lines below deck shall be placed in special ducts.*	*In compliance with the Rules of IACS and RO rules and procedures.* *Recognized Organization are authorized for approval of general ship structure based on their standard guidelines and rules for design, construction and survey of ships, any novel arrangements must be submitted to the Administration for review and assessment on a case-by-case basis.*
II-2/4.5.3.3	*The venting system shall be provided with devices to prevent the passage of flame into the cargo tanks. The design, testing and locating of these devices shall comply with the requirements established by the Administration based on the guidelines developed by the Organization.[3] Ullage openings shall not be used for pressure equalization. They shall be provided with self-closing and tightly sealing covers. Flame arresters and screens are not permitted in these openings.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC/Circ.677 as amended* • *MSC/Circ.450/Rev.1*
II-2/4.5.5.1.1	*For tankers of 20,000 tonnes deadweight and upwards constructed on or after 1 July 2002 but before 1 January 2016, the protection of the cargo tanks shall be achieved by a fixed inert gas system in accordance with the requirements of the Fire Safety Systems Code, as adopted by resolution MSC.98(73), except that **the Administration may accept** other equivalent systems or arrangements, as described in paragraph 5.5.4.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *Refer to MSC.365(93), which reproduced below:* • *-For tankers of 8,000 tonnes deadweight and upwards but less than 20,000 tonnes deadweight constructed on or after 1 January 2016, in lieu of fixed installations as required by paragraph 5.5.4.1, the Administration accept other equivalent arrangements or means of protection if accordance with Rules of IACS member accredited by the Administration and in line with regulation I/5 and paragraph 5.5.4.3*

[2] Refer to recommendations published by the International Organization for Standardization, in particular, Publications ISO 15540:1999 on Test methods for fire resistance of hose assemblies and ISO 15541:1999 on Requirements for the test bench of fire resistance of hose assemblies.

[3] Refer to the Revised standards for the design, testing and locating of devices to prevent the passage of flame into cargo tanks in tankers(MSC/Circ.677), as amended by MSC/Circ.1009), and to the Revised factors to be taken into consideration when designing cargo tank venting and gas-freeing arrangements (MSC/Circ.731).

II-2/4.5.5.2.1.	*The requirements for inert gas systems contained in the Fire Safety Systems Code need not be applied to chemical tankers constructed before 1 January 2016, including those constructed before 1 July 2012, and all gas carriers when carrying cargoes described in regulation 1.6.1, provided that they comply with the requirements for inert gas systems on chemical tankers **established by the Administration**, based on the guidelines developed by the Organization[4].*	*In compliance with the Rules of IACS and RO rules and procedures.* *• Refer to MSC.365(93), which reproduced below:* *- The requirements for inert gas systems contained in the Fire Safety Systems Code need not be applied to chemical tankers constructed before 1 January 2016, including those constructed before 1 July 2012, and all gas carriers:* *.1 when carrying cargoes described in regulation 1.6.1, provided that they comply with the requirements for inert gas systems on chemical tankers established by the Recognized Organizations, based on the guidelines developed by the Organization*; or .2 when carrying flammable cargoes other than crude oil or petroleum products such as cargoes listed in chapters 17 and 18 of the International Bulk Chemical Code, provided that the capacity of tanks used for their carriage does not exceed 3,000 m3 and the individual nozzle capacities of tank washing machines do not exceed 17.5 m3/h and the total combined throughput from the number of machines in use in a cargo tank at any one time does not exceed 110 m3/h."* *For inert gas system on chemical tankers, IMO resolution A.567(14) and Corr.1 may be referred.*
II-2/4.5.6.3	*The arrangements for inerting, purging or gas-freeing of empty tanks as required in paragraph 5.5.3.1 shall be **to the satisfaction of the Administration** and shall be such that the accumulation of hydrocarbon vapours in pockets formed by the internal structural members in a tank is minimized and that:* *.1 on individual cargo tanks, the gas outlet pipe, if fitted, shall be positioned as far as practicable from the inert gas/air inlet and in accordance with paragraph 5.3 and regulation 11.6. The inlet of such outlet pipes may be located either at deck level or at not more than 1 m above the bottom of the tank;* *.2 the cross-sectional area of such gas outlet pipe referred to in paragraph 5.6.3.1 shall be such that an exit velocity of at least 20 m/s can be maintained when any three tanks are being simultaneously supplied with inert gas. Their outlets shall extend not less than 2 m above deck level; and* *.3 each gas outlet referred to in paragraph 5.6.3.2 shall be fitted with suitable blanking arrangements.*	*Fixed inerting arrangements iIn compliance with the Rules of IACS and RO rules and procedures may be installed on ships.* *- Refer to IACS UI SC58 Rev.2* *The outlets mentioned in Reg. II-2/4.5.6.3 are to be located in compliance with Reg. II-2/4.5.3.4.1.3 as far as the horizontal distance is concerned.* *- Refer to MSC/Circ.677 - Revised standards for the design, testing and locating of devices to prevent the passage of flame into cargo tanks in oil tankers, and MSC/Circ.450/Rev.1 -Revised factors to be taken into consideration when designing cargo tank venting and gas-freeing arrangements. (MSC/Circ. 1120)*
II-2/5.2.2.5	*In passenger ships, the controls required in paragraphs 2.2.1 to 2.2.4 and in regulations 8.3.3 and 9.5.2.3 and the controls for any required fire extinguishing system shall be situated at one control position or grouped in as few positions as possible **to the satisfaction of the Administration**. Such positions shall have a safe access from the open deck.*	*Positioning or grouping in compliance with the Rules of IACS and RO rules and procedures.* *LSA and FFE plans are submitted to the TRAM, for review against Estonian legislation (Maritime Safety Act)*
II-2/7.3.2	*The function of fixed fire detection and fire alarm systems shall be periodically tested **to the satisfaction of the Administration** by means of equipment producing hot air at the appropriate temperature, or smoke or aerosol particles having the appropriate range of density or particle size, or*	*Testing equipment to be in accordance with the manufacturer's recommendations / instructions. The function of fixed fire detection and fire alarm systems required by the relevant regulations of this chapter shall be tested under varying conditions of ventilation after installation.*

[4] *Refer to the Regulation for inert gas systems on chemical tankers, adopted by the Organization by resolution A.567(14), and Corr.1.*

	other phenomena associated with incipient fires to which the detector is designed to respond.	
II-2/7.6	*A fixed fire detection and fire alarm system or a sample extraction smoke detection system shall be provided in any cargo space which,* ***in the opinion of the Administration****, is not accessible, except where it is shown* ***to the satisfaction of the Administration*** *that the ship is engaged on voyages of such short duration that it would be unreasonable to apply this requirement.*	*TRAM will determine this on a case-by-case basis.*
II-2/8.3.4	*In passenger ships, the controls required by paragraph 3.3 shall be situated at one control position or grouped in as few positions as possible* ***to the satisfaction of the Administration****. Such positions shall have a safe access from the open deck.*	*Positioning or grouping in compliance with the Rules of IACS and RO rules and procedures. LSA and FFE plans are submitted to the TRAM for review .* *As for Passenger ships, LSA and FFE plans are to be submitted to the TRAM for approval after examination by Recognized Organization.*
II-2/9.2.2.3.1	*In addition to complying with the specific provisions for fire integrity of bulkheads and decks of passenger ships, the minimum fire integrity of all bulkheads and decks shall be as prescribed in tables 9.1 and 9.2. Where, due to any particular structural arrangements in the ship, difficulty is experienced in determining from the tables the minimum fire integrity value of any divisions, such values shall be* ***determined to the satisfaction of the Administration****.*	*The TRAM requires on passenger ships carrying not more than 36 passengers the minimum fire integrity of all bulkheads and decks shall be complying with the requirements set in other regulations of SOLAS Part II-2, but shall satisfy specific provisions be as prescribed in tables 9.1 and 9.2. of the Chapter II-2/Regulation 9. Where, due to any particular structural arrangements in the ship, difficulty is experienced in determining from the tables the minimum fire integrity value of any divisions, such values shall be accordance with the Rules of IACS and RO rules and procedures or agreed with the TRAM in a case-by-case basis.*
II-2/9.2.2.4.4	*External boundaries which are required in regulation 11.2 to be of steel or other equivalent material may be pierced for the fitting of windows and side scuttles provided that there is no requirement for such boundaries of passenger ships to have "A" class integrity. Similarly, in such boundaries which are not required to have "A" class integrity, doors may be constructed of materials which* ***are to the satisfaction of the Administration****.*	*The TRAM determines that external boundaries to be of steel or other equivalent material may be pierced for the fitting of windows and side scuttles provided that there is no requirement for such boundaries of passenger ships to have "A" class integrity. Similarly, in such boundaries which are not required to have "A" class integrity, doors may be constructed of other materials as approved with the Rules of IACS and RO rules and procedures.*
II-2/9.2.3.3.4	*External boundaries which are required in regulation 11.2 to be of steel or other equivalent material may be pierced for the fitting of windows and sidescuttles provided that there is no requirement for such boundaries of cargo ships to have "A" class integrity. Similarly, in such boundaries which are not required to have "A" class integrity, doors may be constructed of materials which* ***are to the satisfaction of the Administration****.*	*The TRAM determines that external boundaries to be of steel or other equivalent material may be pierced for the fitting of windows and side scuttles provided that there is no requirement for such boundaries of cargo ships to have "A" class integrity. Similarly, in such boundaries which are not required to have "A" class integrity, doors may be constructed of other materials as approved with the Rules of IACS and RO rules and procedures.*
II-2/9.2.4.2.4	*External boundaries which are required in regulation 11.2 to be of steel or other equivalent material may be pierced for the fitting of windows and sidescuttles provided that there is no requirement for such boundaries of tankers to have "A" class integrity. Similarly, in Consolidated text valid as of 1 January 2017 such boundaries which are not required to have "A" class integrity, doors may be constructed of materials which are* ***to the satisfaction of the Administration****.*	*The TRAM determines that external boundaries on tankers which are required to be of steel or other equivalent material may be pierced for the fitting of windows and sidescuttles provided that there is no requirement for such boundaries of tankers to have "A" class integrity. Similarly, in such boundaries which may not be required to have "A" class integrity, doors may be constructed of other materials as approved with the Rules of IACS and RO rules and procedures.*
II-2/9.5.2.4	*In passenger ships, the means of control required in paragraph 5.2.3 shall be situated at one control position or grouped in as few positions as* ***possible to the satisfaction of the Administration****. Such positions shall have safe access from the open deck.*	*Positioning or grouping in compliance with the Rules of IACS and RO rules and procedures. LSA and FFE plans are submitted to the TRAM, for review against Estonian legislation (Maritime Safety Act)*

II-2/10.2.1.2.2	*The arrangements for the ready availability of water supply shall be: .2 in cargo ships:.**2.1 to the satisfaction of the Administration***	*In compliance with the Rules of IACS and RO rules and procedures. FFE plans are submitted to the TRAM, for review against Estonian legislation (Maritime Safety Act).*
II-2/10.2.3.2.1	*2.3.2.1 Ships shall be provided with fire hoses the number and diameter of which shall be **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures. -The design of the piping system must be taken into consideration in determining the number of fire hoses, the minimum diameter of a fire hose must be 38 mm, and every fire hose must have the same diameter, but hoses in machinery spaces and other interior locations may have a smaller diameter than hoses in other locations if the smaller diameter is for the purpose of convenient handling*
II-2/10.3.2.1	*Accommodation spaces, service spaces and control stations shall be provided with portable fire extinguishers of appropriate types and in sufficient number **to the satisfaction of the Administration**. Ships of 1,000 gross tonnage and upwards shall carry at least five portable fire extinguishers.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1Circ.1275*
II-2/10.7.1.2	*Where it is shown **to the satisfaction of the Administration** that a passenger ship is engaged on voyages of such short duration that it would be unreasonable to apply the requirements of paragraph 7.1.1 and also in ships of less than 1,000 gross tonnage, the arrangements in cargo spaces shall be to the satisfaction of the Administration, provided that the ship is fitted with steel hatch covers and effective means of closing all ventilators and other openings leading to the cargo spaces.*	*In compliance with the Rules of IACS and RO rules and procedures. The cargo spaces shall be fitted with steel hatch covers and effective means of closing all ventilators and other openings leading to the cargo spaces. .*
II-2/10.7.3.2.4	*The operational performance of each mobile water monitor shall be tested during initial survey on board the ship **to the satisfaction of the Administration**. The test shall verify that: .1 the mobile water monitor can be securely fixed to the ship structure ensuring safe and effective operation; and the mobile water monitor jet reaches the top tier of containers with all required monitors and water jets from fire hoses operated simultaneously.*	*In compliance with the Rules of IACS and RO rules and procedures. The test shall verify that: .-the mobile water monitor can be securely fixed to the ship structure ensuring safe and effective operation; and .-the mobile water monitor jet reaches the top tier of containers with all required monitors and water jets from fire hoses operated simultaneously."*
II-2/13.3.1.4	*If a radiotelegraph station has no direct access to the open deck, two means of escape from or access to, the station shall be provided, one of which may be a porthole or window of sufficient size or other means **to the satisfaction of the Administration**.*	*The clear opening size of a porthole or window is 600mm X 600 mm.*
II-2/13.3.2.6.2	*Escape doors from public spaces that are normally latched shall be fitted with a means of quick release. Such means shall consist of a door-latching mechanism incorporating a device that releases the latch upon the application of a force in the direction of escape flow. Quick release mechanisms shall be designed and installed **to the satisfaction of the Administration** and, in particular: .1 consist of bars or panels, the actuating portion of which extends across at least one half of the width of the door leaf, at least 760 mm and not more than 1120 mm above the deck; .2 cause the latch to release when a force not exceeding 67 N is applied; and .3 not be equipped with any locking device, set screw or other arrangement*	*In compliance (design and installation) and approved in accordance with the Rules of IACS and RO rules and procedures. Refer to SOLAS II-2/13.3.2.6.2 guidelines: Quick release mechanisms shall be designed and installed - consist of bars or panels, the actuating portion of which extends across at least one half of the width of the door leaf, at least 760 mm and not more than 1120 mm above the deck; - cause the latch to release when a force not exceeding 67 N is applied; and . -not be equipped with any locking device, set screw or other arrangement that prevents the release of the latch when pressure is applied to the releasing device*

	that prevents the release of the latch when pressure is applied to the releasing device.	
II-2/13.5.1	*In special category and open ro-ro spaces to which any passengers carried can have access, the number and locations of the means of escape both below and above the bulkhead deck shall be **to the satisfaction of the Administration** and, in general, the safety of access to the embarkation deck shall be at least equivalent to that provided for under paragraphs 3.2.1.1, 3.2.2, 3.2.4.1 and 3.2.4.2. Such spaces shall be provided with designated walkways to the means of escape with a breadth of at least 600 mm. The parking arrangements for the vehicles shall maintain the walkways clear at all times.*	*In compliance with the Rules of IACS and RO rules and procedures.*
II-2/19.3.1.2	*The quantity of water delivered shall be capable of supplying four nozzles of a size and at pressures as specified in regulation 10.2, capable of being trained on any part of the cargo space when empty. This amount of water may be applied by equivalent means **to the satisfaction of the Administration.***	*In compliance with the Rules of IACS member accredited by the Administration.* • *MSC.1Circ.1120* • *MSC.99(73)* *Hydrants for dangerous goods- The number and position of hydrants should be such that at least two of the required four jets of water, when supplied by single lengths of hose, may reach any part of the cargo space when empty; and all four jets of water, each supplied by single lengths of hose may reach any part of ro-ro cargo spaces.*
II-2/19.3.2	*Electrical equipment and wiring shall not be fitted in enclosed cargo spaces or vehicle spaces unless it is essential for operational purposes in the opinion of the Administration. However, if electrical equipment is fitted in such spaces, it shall be of a certified safe type for use in the dangerous environments to which it may be exposed unless it is possible to completely isolate the electrical system (e.g.by removal of links in the system, other than fuses). Cable penetrations of the decks and bulkheads shall be sealed against the passage of gas or vapor. Through runs of cables and cables within the cargo spaces shall be protected against damage from impact. Any other equipment which may constitute a source of ignition of flammable vapor shall not be permitted.*	*Electrical equipment and wiring shall not be fitted in enclosed cargo spaces unless it is essential for operational purposes in the opinion of the Recognized Organisation. However, if electrical equipment is fitted in such spaces, it shall be of a certified safe type for use in the dangerous environments to which it may be exposed unless it is possible to completely isolate the electrical system. Cable penetrations of the decks and bulkheads shall be sealed against the passage of gas or vapor. Through runs of cables and cables within the cargo spaces shall be protected against damage from impact/ Any other equipment which may constitute a source of ignition of flammable vapor shall not be permitted.*
II-2/19 Table 19.1 Note 4	*(in case of p 3.2, 3.3, 3.4.1 and 3.4.2) In the special case where the barges are capable of containing flammable vapours or alternatively if they are capable of discharging flammable vapours to a safe space outside the barge carrier compartment by means of ventilation ducts connected to the barges, these requirements may be reduced or waived **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.*
II-2/20.4.1 Before 01.01.2026	*Except as provided in paragraph 4.3.1, there shall be provided a fixed fire detection and fire alarm system complying with the requirements of the Fire Safety Systems Code. The fixed fire detection system shall be capable of rapidly detecting the onset of fire. The type of detectors and their spacing and location shall be **to the satisfaction of the Administration** taking into*	*In compliance with the Rules of IACS and RO rules and procedures.* • *FSS Code on Chapter 9 Fixed Fire Detection and Fire Alarms Systems;* • *IMO MSC/Circ.1120* • *MSC.1/Circ.1615*

	account the effects of ventilation and other relevant factors. After being installed the system shall be tested under normal ventilation conditions and shall give an overall response time ***to the satisfaction of the Administration****.*	
II-2/20.4.1.1.1 After 01.01.2026	*The fixed fire detection and fire alarm system shall provide smoke and heat detection throughout vehicle, special category and ro-ro spaces. The Administration may accept linear heat detectors as the required system for heat detection. The system shall be capable of rapidly detecting the onset of fire. The location of detectors shall be to the satisfaction of the Administration, taking into account the effects of ventilation and other relevant factors. After being installed, the system shall be tested under normal ventilation conditions and shall give an overall response time to the satisfaction of the Administration.*	
II-2/20.4.1.4 Constructed after 01.01.2026	*There shall be provided a fixed fire detection and fire alarm system for the area on the weather deck intended for the carriage of vehicles. The fixed fire detection system shall be capable of rapidly detecting the onset of the fire anywhere on the area. The type of detectors and their spacing and location shall be to the satisfaction of the Administration, taking into account the effects of weather conditions, cargo obstruction and other relevant factors. Different settings may be used for specific operation sequences, such as during loading or unloading and during voyage, in order to reduce the false alarms.*	
II-2/20.4.1.5 Constructed after 01.01.2026	*In cargo ships, vehicle spaces, special category spaces and ro-ro spaces shall be provided with a fixed fire detection and fire alarm system complying with the requirements of the Fire Safety Systems Code. The fixed fire detection system shall be capable of rapidly detecting the onset of fire. The type of detectors and their spacing and location shall be to the satisfaction of the Administration, taking into account the effects of ventilation and other relevant factors. After being installed, the system shall be tested under normal ventilation conditions and shall give an overall response time to the satisfaction of the Administration.*	
III/4.2	*Before giving approval to life-saving appliances and arrangements,* ***the Administration shall ensure*** *that such life-saving appliances and arrangements:* *.1 are tested, to confirm that they comply with the requirements of this*	*Estonian legislation (Maritime Safety Act § 19.1. Requirements for installation and placing on market of safety equipment of ships)* • *Resolution A.689(17)* • *MSC.81(70). Revised Recommendation on Testing of Life-Saving Appliances*

	chapter and the Code, in accordance with the recommendations of the Organization[5];or *.2 have successfully undergone, **to the satisfaction of the Administration**, tests which are substantially equivalent to those specified in those recommendations.*	
III/4.6	*Life-saving appliances required by this chapter for which detailed specifications are not included in the Code shall be **to the satisfaction of the Administration**.*	*Estonian legislation (Safety requirements for ships § 26 and Maritime Safety Act § 19.1. Requirements for installation and placing on market of safety equipment of ships). TRAM will determine this on a case-by-case basis if necessary.*
III/7.2.2	*Lifejackets shall be so placed as to be readily accessible and their position shall be plainly indicated. Where, due to the particular arrangements of the ship, the lifejackets provided in compliance with the requirements of paragraph 2.1 may become inaccessible, alternative provisions shall be made **to the satisfaction of the Administration** which may include an increase in the number of Lifejackets to be carried.*	*Estonian legislation (Safety requirements for ships § 35 and Maritime Safety Act § 19.1. Requirements for installation and placing on market of safety equipment of ships). TRAM will determine this on a case-by-case basis if necessary.*
III/7.3	*An immersion suit, complying with the requirements of section 2.3 of the Code or an anti-exposure suit complying with section 2.4 of the Code, of an appropriate size, shall be provided for every person assigned to crew the rescue boat or assigned to the marine evacuation system party. If the ship is constantly engaged in warm climates* where, **in the opinion of the Administration** thermal protection is unnecessary, this protective clothing need not be carried.*	*Guidelines for assessment of thermal protection (MSC/Circ.1046).* *Application for exemption shall be submitted to the TRAM.*
III/32.3.2	*An immersion suit of an appropriate size, complying with the requirements of section 2.3 of the Code shall be provided for every person on board the ship. However, for ships other than bulk carriers, as defined in regulation IX/1, these immersion suits need not be required if the ship is constantly engaged on voyages in warm climates** where, in the opinion of the Administration, immersion suits are unnecessary.*	*Guidelines for assessment of thermal protection (MSC/Circ.1046).* *Application for exemption shall be submitted to the TRAM.*
III/32.2.3	*Lights fitted on lifejackets on board cargo ships prior to 1 July 1998 and not complying fully with paragraph 2.2.3 of the Code **may be accepted by the Administration** until the lifejacket light would normally be replaced or until the first periodical survey after 1 July 2001, whichever is the earliest.*	*Estonian legislation Safety requirements for ships § 35*
IV/16.1	*Every ship shall carry personnel qualified for distress and safety radiocommunication purposes **to the satisfaction of the Administration**.[6] The personnel shall be holders of certificates specified in the Radio Regulations as appropriate, any one of whom shall be designated to have primary responsibility for radiocommunications during distress incidents.*	*STCW Code, chapter IV, section B-IV/2.* *Refer to the minimum Safe Manning Document*
III/17	*A record shall be kept, **to the satisfaction of the Administration** and as*	*Estonian legislation (The procedure and recommended forms for keeping the logbook,*

[5] *Refer to the Recommendation on Testing of Life-Saving Appliances adopted by the Organization by resolution A.689(17). For life-saving appliances installed on board on or after 1 July 1999, refer to the Revised Recommendations on testing of life-saving appliances adopted by the Maritime Safety Committee of the Organization by resolution MSC.81(70)*

[6] *Refer to the STCW Code, chapter IV, section B-IV/2.*

	required by the Radio Regulations, of all incidents connected with the radio communication service which appear to be of importance to safety of life at sea.	*machine logbook and radio logbook § 6).* *GMDSS log book to be maintained and entries could include following:* *- records of communications relating to distress, urgency and safety traffic, records of important incidents connected with the radio service, regular positions of the ship,* *- results of tests (daily, weekly and monthly) carried out on the radio equipment* *- retention period of such GMDSS log book can be of 3 years*
V/1.4	***The Administration shall determine** to what extent the provisions of regulations 15 - 28 do not apply to the following categories of ships:* *.1. ships below 150 gross tonnage engaged on any voyage;* *.2. ships below 500 gross tonnage not engaged on international voyages; and* *.3. fishing vessels.*	*Whether special requirements by the Estonian legislation regarding navigation equipment have not been determined, requirements subject to gross tonnage as set in Chapter V of SOLAS shall be applied.* *Relevant Estonian legislation Safety requirements for ships Chapter 3 deals with safety of navigation and applies to ships including those towed or pushed by a tug or other such ships, and they shall comply with regulations relating to the prevention of collisions (COLREG) and the routeing measures adopted by the IMO. The subject covered include danger messages, routeing, misuse of distress signals, obligations and procedures for sending distress messages, signaling lamps, shipborne navigational equipment, nautical publications, international code of signals, and lifesaving signals.*
V/23.3.3.3	*Safe and convenient access to, and egress from, the ship shall be provided by either:* *.1 a pilot ladder requiring a climb of not less than 1.5 m and not more than 9 m above the surface of the water so positioned and secured that:* *…* *.3 each step rests firmly against the ship's side; where constructional features, such as rubbing bands, would prevent the implementation of this provision, special arrangements shall**, to the satisfaction of the Administration**, be made to ensure that persons are able to embark and disembark safely;*	*In compliance with the Rules of IACS and RO rules and procedures.* • *Estonian legislation (Maritime Safety Act § 19.1. Requirements for installation and placing on market of safety equipment of ships) applies.* • *MSC.1/Circ.1495 Unified Interpretation of SOLAS Regulation V/23.3.3* *Salient points from IMO Resolution A.1045 (27) which is pilot ladder should be certified by the manufacturer as complying with SOLAS, Chapter V/Reg.23 or ISO 799:2004* *Where rubbing bands or other constructional features might prevent the safe approach of a pilot boat, these should be cut back to provide at least 6 metres of unobstructed ship's side. Specialized offshore ships less than 90 m or other similar ships less than 90 m for which a 6 m gap in the rubbing bands would not be practicable, do not have to comply with this requirement. In this case, other appropriate measures should be taken to ensure that persons are able to embark and disembark safely.*
VI/3.1	*1 When transporting a solid bulk cargo which is liable to emit a toxic or flammable gas, or cause oxygen depletion in the cargo space, an appropriate instrument for measuring the concentration of gas or oxygen in the air shall be provided together with detailed instructions for its use. Such an instrument shall be **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *SOLAS VI-1, Reg. 7*
VI/6.1	*Prior to loading a solid bulk cargo, the master shall be in possession of comprehensive information on the ship's stability and on the distribution of cargo for the standard loading conditions. The method of providing such information shall be to the satisfaction of the Administration.*[7]	*IMSBC Code Part B – Special provisions for solid bulk cargoes under regulation 7 (Loading, unloading and stowage of solid bulk cargoes)* *The Code of Practice for the Safe Loading and Unloading of Bulk Carriers (BLU Code) adopted by the Organization by resolution A.862(20), as amended*
VIII/4	*The design, construction and standards of in inspection and assembly of the*	*TRAM will determine this on a case-by-case basis as no nuclear ships under registry*

[7] *Refer to regulation II-1/5-1 on Stability information to be supplied to the master.*

	reactor installation shall be subject ***to the approval and satisfaction of the Administration*** *and shall take account of the limitations which will be imposed on surveys by the presence of radiation.*	*When necessary the Estonian legislation will apply.*
Annex 1	*Certificates for masters, officers or ratings Certificates for masters, officers or ratings shall be issued to those candidates who****, to the satisfaction of the Administration****, meet the requirements for service, age, medical fitness, training, qualifications and examinations in accordance with the provisions of the STCW Code annexed to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978. Formats of certificates are given in section A-I/2 of the STCW Code. Certificates must be kept available in their original form on board the ships on which the holder is serving.*	*Estonian legislation (Maritime Safety Act § 76(1.4) and Chapter 5).* • *STCW 1978, article VI, regulation I/2;* • *STCW Code, section A-I/2*
Annex 1	*Crude Oil Washing Operation and Equipment Manual (COW Manual), Every oil tanker operating with crude oil washing systems shall be provided with an Operations and Equipment Manual detailing the system and equipment and specifying operational procedures. Such a Manual shall be* ***to the satisfaction of the Administration*** *and shall contain all the information set out in the specifications referred to in regulation 35 of Annex I of MARPOL. MARPOL Annex I, regulation 35; resolution MEPC.81(43)*	*In compliance with the Rules of IACS and RO rules and procedures.* *-Fully delegated approval of drawings, calculations, specifications, manuals, materials and equipment required by the MARPOL 73/78 Convention as amended* *-Resolution A.891(22) Amendments to the revised specifications for the design, operation and control of Crude Oil Washing systems (resolution A.446(11) as amended by Resolution A.497(12))*

<table>
<tr><th colspan="3">MARPOL 1973/78, as amended</th></tr>
<tr><th>Annex/ Reg</th><th>Paragraph text</th><th>TRAM Guidance</th></tr>
<tr><td>I /Ch.3/14.3</td><td>Ships, such as hotel ships, storage vessels, etc., which are stationary except for non cargo-carrying relocation voyages need not be provided with oil filtering equipment. Such ships shall be provided with a holding tank having a volume adequate, to the satisfaction of the Administration, for the total retention on board of the oily bilge water. All oily bilge water shall be retained on board for subsequent discharge to reception facilities.</td><td>In compliance with the Rules of IACS and RO rules and procedures.
MEPC.1/CIRC.642 The following guidance provided in paragraph 8.2
for the capacity of bilge holding tank, shall be followed<table><tr><th>Main engine rating (kW)</th><th>Capacity (m3)</th></tr><tr><td>up to 1,000</td><td>4</td></tr><tr><td>Above 1,000 up to 20,000</td><td>P/250</td></tr><tr><td>Above 20,000 40</td><td>+P/500</td></tr></table>Where: P = main engine rating in kW.
The lesser capacity may be accepted on case-by-case basis depending on the operating profile of the vessel.</td></tr>
<tr><td>I /Ch.3/14.5</td><td>The Administration may waive the requirements of paragraphs 1 and 2 of this regulation for:
.3 with regard to the provision of subparagraphs .1 and .2 above, the following conditions shall be complied with:
.1 the ship is fitted with a holding tank having a volume adequate, to the satisfaction of the Administration, for the total retention on board of the oily bilge water</td><td>In compliance with the Rules of IACS and RO rules and procedures.
MEPC.1/CIRC.642 The following guidance provided in paragraph 8.2
for the capacity of bilge holding tank, shall be followed<table><tr><th>Main engine rating (kW)</th><th>Capacity (m3)</th></tr><tr><td>up to 1,000</td><td>4</td></tr><tr><td>Above 1,000 up to 20,000</td><td>P/250</td></tr><tr><td>Above 20,000 40</td><td>+P/500</td></tr></table>Where: P = main engine rating in kW.
The lesser capacity may be accepted on case-by-case basis depending on the operating profile of the vessel.</td></tr>
<tr><td>I /Ch.4/18.5</td><td>Notwithstanding the provisions of paragraph 2 of this regulation the segregated ballast conditions for oil tankers less than 150 meters in length shall be to the satisfaction of the Administration.</td><td>In compliance with the Rules of IACS and RO rules and procedures.
The unified interpretations of Annex I of MARPOL 73/78 for the Regulation 18.5, shall be followed for segregated ballast conditions for oil tankers less than 150 metres in length:
1. In determining the minimum draught and trim of oil tankers less than 150 metres in length to be qualified as SBT oil tankers, the Administration should follow the guidance set out in appendix 1.
2. The formulae set out in appendix 1 replace those set out in regulation 18.2, and these oil tankers should also comply with the conditions laid down in regulations 18.3 and 18.4 in order to be qualified as SBT oil tankers.</td></tr>
<tr><td>I /Ch.4/18.8.2</td><td>The arrangements and operational procedures for dedicated clean ballast tanks shall comply with the requirements established by the Administration. Such requirements shall contain at least all the provisions of the revised Specifications for Oil Tankers with Dedicated Clean Ballast Tanks adopted by the Organization by resolution A.495(XII)</td><td>The arrangements and operational procedures for dedicated clean ballast tanks should comply with all the provisions of the revised Specifications for Oil Tankers with Dedicated Clean Ballast Tanks adopted by the Organization by resolution A.495(XII)</td></tr>
<tr><td>I /Ch.4/18.8.4</td><td>Every product carrier operating with dedicated clean ballast tanks shall be provided</td><td>The dedicated clean ballast tank operation manual shall comply with</td></tr>
</table>

MARPOL 1973/78, as amended		
Annex/ Reg	**Paragraph text**	**TRAM Guidance**
	*with a Dedicated Clean Ballast Tank Operation Manual detailing the system and specifying operational procedures. Such a Manual shall be **to the satisfaction of the Administration** and shall contain all the information set out in the Specifications referred to in subparagraph 8.2 of this regulation. If an alteration affecting the dedicated clean ballast tank system is made, the Operation Manual shall be revised accordingly.*	*the requirements set out in resolution A.495(XII).*
I /Ch.4/23.3	*To provide adequate protection against oil pollution in the event of collision or stranding the following shall be complied with:* *.1 for oil tankers of 5,000 tonnes deadweight (DWT) and above, the mean oil outflow parameter shall be as follows:* *OM ≤ 0.015 for C ≤ 200,000 m^3* *OM ≤ 0.012 + (0.003/200,000) (400,000-C) for 200,000 m3 < C < 400,000 m^3* *OM ≤ 0.012 for C ≥ 400,000 m^3* *for combination carriers between 5,000 tonnes deadweight (DWT) and 200,000 m^3 capacity, the mean oil outflow parameter may be applied, provided calculations are **submitted to the satisfaction of the Administration**, demonstrating that after accounting for its increased structural strength, the combination carrier has at least equivalent oil out flow performance to a standard double hull tanker of the same size having a OM ≤ 0.015.* *OM ≤ 0.021 for C ≤ 100,000 m3* *OM ≤ 0.015 + (0.006/100,000) (200,000-C) for 100,000 m3 < C ≤ 200,000 m^3* *where: OM = mean oil outflow parameter.* *C = total volume of cargo oil, in m3, at 98% tank filling*	*For combination carriers between 5,000 tonnes deadweight (DWT) and 200,000 m^3 capacity, the mean oil outflow parameter may be applied, provided calculations demonstrating that, after accounting for its increased structural strength, the combination carrier has at least equivalent oil outflow performance to a standard double hull tanker of the same size having an OM ≤ 0.015 shall be submitted for approval to TRAM or Recognized Organisation will review the compliance against the Rules of IACS and RO rules and procedures and submit for review to TRAM.* *The calculations shall take into account provisions of MEPC.122(52).*
I /Ch.4/28.3	*Oil tankers shall be regarded as complying with the damage stability criteria if the following requirements are met:* *.4 **The Administration shall be satisfied** that the stability is sufficient during intermediate stages of flooding.*	*The stability in compliance with the Rules of IACS and RO rules and procedures.* • *The MSC.1/Circ.1461*
I /Ch.4/28.6	*All oil tankers shall be fitted with a stability instrument, capable of verifying compliance with intact and damage stability requirements approved by the Administration having regard to the performance standards recommended by the Organization:* *.2 notwithstanding the requirements of subparagraph .1 a stability instrument fitted on an oil tanker constructed before 1 January 2016* *need not be replaced provided it is capable of verifying compliance with intact and damage stability, **to the satisfaction of the Administration**.*	*The stability instrument in compliance with the Rules of IACS and RO rules and procedures.* *The stability instrument shall comply with following requirements:* *• MSC.1/Circ.1229.* *• MSC.1/Circ.1461* *• IACS UR L5*
I /Ch.4/30.6.5	*On oil tankers delivered on or before 31 December 1979, as defined in regulation 1.28.1, at sea dirty ballast water or oil contaminated water from cargo tank areas may be discharged below the waterline,* *subsequent to or in lieu of the discharge by the method referred to in subparagraph 6.4 of this paragraph, provided that:* *.2 such part flow arrangements comply with the **requirements established by the***	*The flow arrangements in compliance with the Rules of IACS and RO rules and procedures.* *The Appendix 4 to Unified Interpretations of MARPOL Annex I (Specifications for the design, installation and operation of a part flow system for control of overboard discharges) shall be followed.*

MARPOL 1973/78, as amended		
Annex/ Reg	**Paragraph text**	**TRAM Guidance**
	***Administration**, which shall contain at least all the provisions of the Specifications for the Design, Installation and Operation of a Part Flow System for Control of Overboard Discharges adopted by the Organization.*	
I /Ch.4/30.7	*Every oil tanker of 150 gross tonnage and above delivered on or after 1 January 2010, as defined in regulation 1.28.8, which has installed a sea chest that is permanently connected to the cargo pipeline system, shall be equipped with both a sea chest valve and an inboard isolation valve. In addition to these valves, the sea chest shall be capable of isolation from the cargo piping system whilst the tanker is loading, transporting, or discharging cargo by use of a positive means that is **to the satisfaction of the Administration**. Such a positive means is a facility that is installed in the pipeline system in order to prevent, under all circumstances, the section of pipeline between the sea chest valve and the inboard valve being filled with cargo.*	*The isolating arrangements in compliance with the Rules of IACS and RO rules and procedures.* • *The following Unified Interpretation of MARPOL Annex I to regulation 30.7 shall be followed:* *Examples of positive means may take the form of blanks, spectacle blanks, pipeline blinds, evacuation or vacuum systems, or air or water pressure systems. In the event that the evacuation or vacuum systems, or air or water pressure systems are used, then these systems are to be equipped with both a pressure gauge and alarm system to enable the continuous monitoring of the status of the pipeline section, and thereby the valve integrity, between the sea chest and inboard valves.*
I /Ch.4/33.2	*Crude oil washing installation and associated equipment and arrangements shall comply with the **requirements established by the Administration**. Such requirements shall contain at least all the provisions of the Specifications for the Design, Operation and Control of Crude Oil Washing Systems adopted by the Organization. When a ship is not required, in accordance with paragraph 1 of this regulation to be, but is equipped with crude oil washing equipment, it shall comply with the safety aspects of the above-mentioned Specifications.*	*Crude oil washing installation and associated equipment in compliance with the Rules of IACS and RO rules and procedures.* *Crude oil washing installation and associated equipment and arrangements shall comply in accordance with the requirements of the Revised specifications for the design, operation and control of crude oil washing systems, Resolution A.446 (XI), amended by A.497 (XII) and A.897 (21).*
I /Ch.4/35.1	*Every oil tanker operating with crude oil washing systems shall be provided with an Operations and Equipment Manual detailing the system and equipment and specifying operational procedures. Such a Manual shall be to the satisfaction of the Administration and shall contain all the information set out in the specifications referred to in paragraph 2 of regulation 33 of this Annex. If an alteration affecting the crude oil washing system is made, the Operations and Equipment Manual shall be revised accordingly.*	*Every oil tanker operating with crude oil washing system shall be provided with an Operations and Equipment Manual in accordance with the requirements of MEPC.3 (XII) amended by MEPC.81 (43).*
I /Ch.4/36.9	*For oil tankers of less than 150 gross tonnage operating in accordance with regulation 34.6 of this Annex, an appropriate Oil Record Book should be developed by the Administration.*	*Estonian legislation Safety requirements for ships § 40* *The provisions as applicable for oil tanker of 150 gross tonnage and above shall be followed.*
II /Ch.1/5.3.4	*Notwithstanding the provisions of paragraphs 1 and 2 of this regulation, the construction and equipment of liquefied gas carriers certified to carry Noxious Liquid Substances listed in the applicable Gas Carrier Code, shall be deemed to be equivalent to the construction and equipment requirements contained in regulations 11 and 12 of this Annex, provided that the gas carrier meets all following conditions:* *.4 be provided with pumping and piping arrangements, which**, to the satisfaction of the Administration**, ensure that the quantity of cargo residue remaining in the tank and its associated piping after unloading does not exceed the applicable quantity of residue as required by regulation 12.1, 12.2 or 12.3*	*The piping system shall meet the performance test requirement of appendix V of MARPOL Annex II.*

MARPOL 1973/78, as amended		
Annex/ Reg	**Paragraph text**	**TRAM Guidance**
II /Ch.4/11.2	*In respect of ships other than chemical tankers or liquefied gas carriers certified to carry Noxious Liquid Substances in bulk identified in chapter 17 of the International Bulk Chemical Code,* ***the Administration shall establish appropriate measures*** *based on the Guidelines developed by the Organization in order to ensure that the provisions shall be such as to minimize the uncontrolled discharge into the sea of such substances.*	*The instructions provided in Engineering Circular No.03 of 2018 shall be followed.* *OSV Chemical Code applies to ships the keel of which are laid, on or after 1st July 2018, or which are at the stage where: construction identifiable with the vessel begins; and assembly has commenced comprising at least 50 tonnes or 1% of the estimated mass of all structural material, whichever is less;* *Existing OSV's the keel of which were laid or which were at a similar stage of construction on or after 19th April 1990 but before 1st July 2018 are permitted to carry products as assigned for carriage on a type 2 ship in the IBC Code, provided that these OSV's comply with the OSV chemical Code, except for the amended stability provisions in chapter 2 of the OSV chemical Code.* *For vessels constructed before 1 July 2018, the LHNS Guidelines [Resolutions A.673(16), as amended by resolution MEPC.158(55) and MEPC.148(54)] shall be applied.*
IV /Ch.3/9.2	*1. Every ship which, in accordance with regulation 2, is required to comply with the provisions of this Annex shall be equipped with one of the following sewage systems:* *2. a sewage comminuting and disinfecting system* ***approved by the Administration****. Such system shall be fitted with facilities to the satisfaction of the Administration, for the temporary storage of sewage when the ship is less than 3 nautical miles from the nearest land*	*The sewage comminuting and disinfecting system shall in compliance with the Rules of IACS and RO rules and procedures and taking into account following standards:* *-Faecal Coliform Standard: Faecal coliform bacteria in the effluent should not exceed 1000/100 cm³ Most Probable Number (M.P.N.);* *-Chlorine residual level to be no more than 0.5mg/l, (by test) post maceration;* *-Comminuting Standard: A sample of one litre is passed through a US Sieve No. 12 (with openings of 1.68 mm). The weight of the material retained on the screen after it has been dried to a constant weight in an oven at 103°C must not exceed 10% of the total suspended solids and shall not be more than 50mg.*
IV /Ch.3/9.3	*1. Every ship which, in accordance with regulation 2, is required to comply with the provisions of this Annex shall be equipped with one of the following sewage systems:* *3. a holding tank of the capacity* ***to the satisfaction of the Administration*** *for the retention of all sewage, having regard to the operation of the ship, the number of persons on board and other relevant factors. The holding tank shall be constructed to the satisfaction of the Administration and shall have a means to indicate visually the amount of its contents.*	*In compliance with the Rules of IACS and RO rules and procedures. Estonian legislation Safety requirements §41 for ships shall be taken account:* *A ship with a total crew and passengers of more than 15 persons or with a total tonnage of 400 or more, regardless of the number of persons on board, shall comply with the requirements of Annex IV to the MARPOL Convention, and a ship with a total crew and passengers of more than ten persons or with a total tonnage of 200 or more, regardless of the number of persons on board, shall also comply with the 1992 Convention for the Protection of the Marine Environment of the Baltic Sea Area in order to prevent pollution by sewage as follows:* *-the sewage tank on the ship shall be designed to hold 25 litres of*

MARPOL 1973/78, as amended		
Annex/ Reg	**Paragraph text**	**TRAM Guidance**
		sewage per person per day and shall provide the ship with a capacity reserve of three days; *-if domestic wastewater is also discharged into the tank, then 50 liters of wastewater and wastewater per person per day and a three-day capacity reserve must be taken into account.*
VI /Ch.3/13.1.1.2	*1.1 This regulation shall apply to:* *2. each marine diesel engine with a power output of more than 130 kW that undergoes a major conversion on or after 1 January 2000 except when demonstrated **to the satisfaction of the Administration** that such engine is an identical replacement to the engine that it is replacing and is otherwise not covered under paragraph 1.1.1 of this regulation.*	*In compliance with the Rules of IACS and RO rules and procedures.*
VI /Ch.3/13.5.2.2	*5.2 The standards set forth in paragraph 5.1.1 of this regulation shall not apply to:* *2. a marine diesel engine installed on a ship with a combined nameplate diesel engine propulsion power of less than 750 kW if it is demonstrated, **to the satisfaction of the Administration**, that the ship cannot comply with the standards set forth in paragraph 5.1.1 of this regulation because of design or construction limitations of the ship*	*In compliance with the Rules of IACS and RO rules and procedures. The proposal shall be considered on case-by-case basis taking into consideration of the design or construction limitations of ships for inability to meet the standards set forth in paragraph 5.1.1 of this regulation.*
VI /Ch.3/13.7.2	*Paragraph 7.1 shall apply no later than the first renewal survey that occurs 12 months or more after deposit of the notification in paragraph 7.1. If a shipowner of a ship on which an approved method is to be installed can demonstrate **to the satisfaction of the Administration** that the approved method was not commercially available despite best efforts to obtain it, then that approved method shall be installed on the ship no later than the next annual survey of that ship which falls after the approved method is commercially available.*	*In compliance with the Rules of IACS and RO rules and procedures. The proposal shall be considered on case-by-case basis taking into account list of approved methods and associated engines to which the approved method is applicable available on IMO GISIS portal and proposal from a shipowner demonstrating that the approved method is not commercially available despite best efforts to obtain it.*
VI /Ch.3/14.6	*The volume of low sulphur fuel oils in each tank as well as the date, time, and position of the ship when any fuel-oil-change-over operation is completed prior to the entry into an Emission Control Area or commenced after exit from such an area, shall be recorded in such log-book or electronic record book **as prescribed by the Administration**.*	*Entry made in ships official log book shall be considered acceptable.*
VI /Ch.4/22	*The attained EEDI shall be calculated for:* *.1 each new ship;* *.2 each new ship which has undergone a major conversion; and* *.3 each new or existing ship which has undergone a major conversion that is so extensive that the ship is regarded by the Administration as a newly constructed ship*	*Latest revision of MEPC.1/Circ.795 shall be followed for interpretation of major conversion.* *Extensive major conversion regarded a newly constructed ship, will be considered on a case-by-case basis*

Load Lines, 1966, as amended		
Annex Reg	**Paragraph text**	**TRAM Guidance**
I /1.1	The **Administration shall satisfy itself** that the general structural strength of the hull is adequate for the draught corresponding to the freeboard assigned.	The relevant rules for structural strength if in compliance with the Rules of IACS and RO rules and procedures are adequate.
I /1.2	A ship which is designed, constructed and maintained in compliance with the appropriate requirements of an organization, including a classification society, which is **recognized by the Administration** or with applicable national standards of the Administration in accordance with the provisions of regulation 2-1, may be considered to provide an acceptable level of strength. The above provisions shall apply to all structures, equipment and fittings covered by this annex for which standards for strength and construction are not expressly provided.	The relevant rules for structural strength if in compliance with the Rules of IACS and RO rules and procedures are adequate.
I /1.3 (a)	Ships constructed before 1 July 2010 shall comply with an intact stability standard **acceptable to the Administration**.	Refer IMO Resolution A 749 (18), as amended by MSC Resolution 75 (69) for Ships constructed before 1 July 2010.
I /2.3	Ships designed to carry sail, whether as the sole means of propulsion or as a supplementary means, and tugs, shall be assigned freeboards in accordance with the provisions of regulations 1 to 40, inclusive. Additional freeboard may be required as **determined by the Administration**.	In compliance with the Rules of IACS and RO rules and procedures. If appropriate rule is unavailable then will be decided on a case-by-case basis by the TRAM.
I /2.4	Ships of wood or of composite construction, or of other materials the use of which the Administration has approved, or ships whose constructional features are such as to render the application of the provisions of this Annex unreasonable or impracticable, shall be assigned freeboards as **determined by the Administration**	In compliance with the Rules of IACS and RO rules and procedures. If appropriate rule is unavailable then will be decided on a case-by-case basis by the TRAM.
I /2.5	Regulations 10 to 26, inclusive, shall apply to every ship to which a minimum freeboard is assigned. Relaxations from these requirements may be granted to a ship to which a greater than minimum freeboard is assigned, **on condition that the Administration is satisfied** with the safety conditions provided.	Ifn compliance with the Rules of IACS and RO rules and procedures then condition fulfilled. If appropriate rule is unavailable then will be decided on a case-by-case basis by the TRAM.
I /8	The ring, lines and letters shall be painted in white or yellow on a dark ground or in black on a light ground. They shall also be permanently marked on the sides of the ships **to the satisfaction of the Administration**. The marks shall be plainly visible and, if necessary, special arrangements shall be made for this purpose.	If in compliance with the Rules of IACS and RO rules and procedures then marking is accepted. If appropriate rule is unavailable then will be decided on a case-by-case basis by the TRAM.
I /10.1	The master of every new ship shall be supplied with information to arrange for the loading and ballasting of his ship in such a way as to avoid the creation of any unacceptable stresses in the ship's structure, provided that this requirement need not apply to any particular length, design or class of ship where **the Administration considers it to be unnecessary.**	If in compliance with the Rules of IACS and RO rules and procedures then condition fulfilled. If appropriate rule is unavailable then will be decided on a case-by-case basis by the TRAM.
I /10.2	Information shall be provided to the master in a form that is approved by the Administration or a recognized organization. Stability information, and loading information also related to ship strength when required under paragraph (1), shall be carried on board at all times together with evidence that the information has been **approved by the Administration**.	-For ships built on or after 1 July 2010, requirements provided in 2008 Intact Stability (IS) Code shall be followed. -For ships built before 1 July 2010, requirements provided in IMO Resolution A 749 (18), as amended by MSC Resolution 75 (69) shall be followed

Load Lines, 1966, as amended		
Annex Reg	**Paragraph text**	**TRAM Guidance**
I /11	*Bulkheads at exposed ends of enclosed superstructures shall be of an acceptable level of strength.*	*In compliance with the Rules of IACS and RO rules and procedures.*
I /12(2)	*Unless otherwise **permitted by the Administration**, doors shall open outwards to provide additional security against the impact of the sea.*	*-The TRAM will only permit deviation from this standard in specific circumstances of practical need, determined on a case-by-case basis by the Recognized Organization, and only if satisfied that an equivalent level of safety to an outward-opening door is achieved. -Where, in exceptional circumstances, the doors are permitted to open inwards, the framing of the door panel and the securing arrangements of the door will be specifically considered. Recognized Organization has to forward the details to the TRAM for the final acceptance.*
I /14.1	*The construction and means for securing the weathertightness of cargo and other hatchways in position 1 and 2 shall be at least equivalent to the requirements of regulation 16, unless the application of regulation 15 to such hatchways is **granted by the Administration**.*	*This will be decided on a case-by-case basis by the TRAM.*
I /14-1(2)	*In the case of hatchways which comply with regulation 16(2) through (5), the height of these coamings may be reduced, or the coamings omitted entirely, **on condition that the Administration is satisfied** that the safety of the ship is not thereby impaired in any sea conditions.*	• *MSC.1/Circ.1535* *"Note: Flush bolted access covers, which are of substantial construction and are secured by gaskets and closely spaced bolts to maintain water tightness, are not subject to the minimum sill height requirements."* *-Coamings of reduced height may be accepted provided that they can withstand the wave loadings in regulations 16(2) through (4) and not exceed the stress levels in 16(5); in other words, they should be at least as strong and seaworthy as the hatch covers, they support. Coamings may be omitted entirely provided that the hatch covers and securing arrangements are tested for weathertightness in any sea condition and additionally the following Notice to be fixed on the hatch: "NOT TO BE OPENED AT SEA". -For escape hatches coamings may be reduced based on specific circumstances of practical need, determined on a case-by-case basis. Recognized Organization has to forward the details to the TRAM for the final acceptance.*
I /14.2	*Coamings and hatchway cover to exposed hatchways on decks above the superstructure deck shall comply with the **requirements of the Administration**.*	*The TRAM requirement in this context is that such coamings and hatchway covers shall comply with the requirements of the Recognized Organization, taking into account their position as defined in Annex I regulation 13 (in association with its Unified Interpretation (ref. IMO MSC.1/Circ.1535)).*
I /15.7	*The strength and stiffness of covers made of materials other than mild steel shall be equivalent to those of mild steel **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.*
I /16.1	*All hatchways in position 1 and 2 shall be fitted with hatch covers of steel or other equivalent material. Except as provided in regulation 14(2), such covers shall be weathertight and fitted with gaskets and clamping devices. The means for securing*	*In compliance with the Rules of IACS and RO rules and procedures.* *A test of weathertightness should be carried out in accordance with IACS Recommendation 14 at the installation of the hatch and at the subsequent*

Load Lines, 1966, as amended		
Annex Reg	**Paragraph text**	**TRAM Guidance**
	*and maintaining weathertightness shall be **to the satisfaction of the Administration**. The arrangements shall ensure that the tightness can be maintained in any sea conditions, and for this purpose tests for tightness shall be required at the initial survey, and may be required at renewal and annual surveys or at more frequent intervals.*	*periodical surveys or after substantial repairs.*
I /16.6	*The means for securing and maintaining weathertightness by other means than gaskets and clamping shall be **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures. Recognized Organization has to forward the details to the TRAM for the final acceptance. -A test of weathertightness should be carried out in accordance with IACS Recommendation 14 at the installation of the hatch and at the subsequent periodical surveys or after substantial repairs.*
I /17.4	*Where due to ship size and arrangement this is not practicable, lesser heights for machinery space and emergency generator room ventilator coamings, fitted with weathertight closing appliances in accordance with regulation 19(4), may be **permitted by the Administration** in combination with other suitable arrangements to ensure an uninterrupted, adequate supply of ventilation to these spaces.*	*In compliance with the Rules of IACS and RO rules and procedures. Recognized Organization has to forward the details to the TRAM for the final acceptance and will be decided on a case-by-case basis. -A lower height may be accepted subject to provision of weathertight closing appliances along with suitable arrangements to ensure an uninterrupted, adequate supply of ventilation to these spaces and other relevant circumstance justify it.* • *MSC.1/Circ.1537/Rev.1, sec 2.3.*
I /19.3	*Ventilators in position 1 the coamings of which extend to more than 4.5 m above the deck, and in position 2 the coamings of which extend to more than 2.3 m above the deck, need not be fitted with closing arrangements unless specifically **required by the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures. This will be decided on a case-by-case basis by the Recognized Organization, but closing appliances need not be fitted unless the fitting of such an appliance is considered necessary by the Recognized Organization in order to provide adequate protection.* • *SOLAS Chapter II-2 Regulation 5 regarding closing appliances for ventilation systems*
I /19.5	*In exposed positions, the height of coamings may be required to be increased **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures. This will be decided on a case-by-case basis by the Recognized Organization. -Where the coaming for any ventilator referred to in regulation 19(1) is situated in a position in which it will be specially exposed to weather and sea, the height of the coaming should be increased by such an amount as is necessary to provide adequate protection having regard to its position.*
I /20.2	*Where these heights may interfere with the working of the ship, a lower height may be approved, provided that **the Administration is satisfied** that the closing arrangements and other circumstances justify a lower height.*	*In compliance with the Rules of IACS and RO rules and procedures. Recognized Organization has to forward the details to the TRAM for the final acceptance and will be decided on a case-by-case basis. The heights may be reduced if: -the working of the ship would be unreasonably impaired if those heights were adhered to;*

Load Lines, 1966, as amended		
Annex Reg	**Paragraph text**	**TRAM Guidance**
		-the closing arrangements will ensure that the lower height is adequately compensated.
I /21.1	*Cargo ports and other similar openings in the sides of ships below the freeboard deck shall be fitted with doors so designed as to ensure the same watertightness and structural integrity as the surrounding shell plating. Unless otherwise **granted by the Administration**, these opening shall open outwards. The number of such openings shall be the minimum compatible with the design and proper working of the ship.*	*In compliance with the Rules of IACS and RO rules and procedures. Recognized Organization has to forward the details to the TRAM for the final acceptance and will be decided on a case-by-case basis, but variation will only be permitted in exceptional circumstances.*
I /21.2	*Unless otherwise **permitted by the Administration**, the lower edge of openings referred to in paragraph (1) shall not be below a line drawn parallel to the freeboard deck at side, which is at its lowest point at least 230 mm above the upper edge of the uppermost load line.*	*In compliance with the Rules of IACS and RO rules and procedures. If rules does not specify the case then Recognized Organization has to forward the details to the TRAM for the final acceptance and will be decided on a case-by-case basis.*
I /21.5	*Arrangements for bow doors and their inner doors, side doors and stern doors and their securing shall be in compliance with the requirements of a recognized organization, or with the **applicable national standards of the Administration** which provide an equivalent level of safety.*	*In compliance with the Rules of IACS and RO rules and procedures. The requirements provided in with the Rules of IACS (SC 220) shall be followed.*
I /22.6	*All valves and shell fittings required by this Regulation shall be of steel, bronze or other approved ductile material. Valves of ordinary cast iron or similar material are not acceptable. All pipes to which this Regulation refers shall be of steel or other equivalent material **to the satisfaction of the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures.*
I /25.2	*Guard rails or bulwarks shall be fitted around all exposed decks. The height of the bulwarks or guard rails shall be at least 1 m from the deck, provided that where this height would interfere with the normal operation of the ship, a lesser height may be approved, **if the Administration is satisfied** that adequate protection is provided.*	*In compliance with the Rules of IACS and RO rules and procedures. Recognized Organization has to forward the details to the TRAM for the final acceptance and will be decided on a case-by-case basis.*
I /27(13)f	***The Administration is satisfied** that the stability is sufficient during intermediate stages of flooding.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *MSC.1/Circ.1461.*
I /28.1	*Freeboards at intermediate lengths of ship shall be obtained by linear interpolation. Ships above 365 meters in length shall be **dealt with by the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures. The requirements provided in with the Rules of IACS (LL 18) shall be followed.*
I /39.3	*Ships which, to suit exceptional operational requirements, cannot meet the requirements of paragraphs (1) and (2) of this Regulation may be given **special consideration by the Administration**.*	*In compliance with the Rules of IACS and RO rules and procedures. Recognized Organization has to forward the details to the TRAM for the final acceptance and will be decided on a case-by-case basis.*
I /44(6)	*Timber deck cargo shall be effectively secured throughout its length by a lashing system **acceptable to the Administration** for the character of the timber carried.*	• *Resolution A.715(17), as amended shall be followed.*
I /44(9)	*Where the requirements prescribed in paragraph (8) are impracticable, alternative arrangements **satisfactory to the Administration** shall be used.*	*In compliance with the Rules of IACS and RO rules and procedures. If rules does not specify the case then Recognized Organization has to forward the details to the TRAM for the final acceptance and will be decided on a case-by-case basis.*

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Annex Reg	**Paragraph text**	**TRAM Guidance**
I /14	*The construction of lanterns and shapes and the installation of lanterns on board the vessel shall be **to the satisfaction of the appropriate authority** of the State whose flag the vessel is entitled to fly.*	*In compliance with the Rules of IACS and RO rules and procedures.* *Only type approved lamps appropriate for the size of vessel may be fitted.* • *MSC.253(83) 'Performance Standards for Navigation Lights, Navigation Light Controllers and associated equipment' to be adhered to. CISR will determine 'closest possible compliance' on a case by case basis whenever a vessel of special construction or purpose cannot comply fully with the provisions of any of these Rules.* • *IACS UIs COLREG1 Rev.1 Corr.1, COLREG3 Rev.1 Corr.1, COLREG4 Corr.1 and COLREG5 are recognized Resolution MSC.253(83) (Adopted on 8 October 2007) Adoption of the Performance Standardsfor Navigation Lights, Navigation Light Controllers and Associated Equipment, MSC.1/Circ.1427 Unified Interpretations of COLREG 1972, as amended, MSC.1/Circ.1260/Rev.1 & MSC.1/Circ.1577*
III /3	*The construction of sound signal appliances, their performance and their installation on board the vessel shall be **to the satisfaction of the appropriate authority** of the State whose flag the vessel is entitled to fly.*	*In compliance with the Rules of IACS and RO rules and procedures.* • *. Fully delegated approval of drawings, calculations, specifications, manuals required by the INTERNATIONAL REGULATIONS ON PREVENTING COLLISIONS AT SEA, 1972. COLREG/Annex III/1 and COLREG/Annex III/2* • *Resolution MSC.253(83) (Adopted on 8 October 2007) Adoption of the Performance Standards for Navigation Lights, Navigation Light Controllers and Associated Equipment, MSC.1/Circ.1427 Unified Interpretations of COLREG 1972, as amended, MSC.1/Circ.1260/Rev.1 & MSC.1/Circ.1577*