



Suomen Varustamot
Rederierna i Finland
Finnish Shipowners' Association

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Ministry of Transport and Communication

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Item: Legislation approving the use of electronical logbooks onboard Finnish flagged vessels (*HE eduskunnalle merilain muuttamisesta sekä Kansainvälisen merenkulkujärjestön yleissopimusten liitteiden muutosten hyväksymisestä ja laeiksi sopimusmuutosten lainsäädännön alaan kuuluvien määräysten voimaansaattamisesta*)

Finnish Shipowners Association “**FSA**” strongly support the revision of the law of sea and the taking into force the annex of SOLAS convention, facilitating the use of Electronic Logbooks “**ELB:s**” onboard Finnish flagged vessels. The FSA has during the last years made several proposals to the ministry to adopt above mentioned legislation.

The benefit of introducing **ELB:s** is to set up efficient vessel data management policies in order to record and monitor the activities taking place on board a vessel and to encourage safety of life at sea and reduce maritime pollution. Most of the vessels trading in Northern Europe are already using **ELB:s**. An **ELB** may provide evidence in case of an incident just like the voyage data recorder “**VDR**”.

At the moment there is a blame and shame situation for Finland being one of the last countries in the entire world still requiring its merchant navy to use traditional paper logbooks. Though IMO already decades ago had decided to accept **ELB:s** because the paper version had appeared to be unable to meet up with the demands of a computerized world. The **ELB:s** are today type approved meeting all the reporting requirements of IMO and accordingly also the regulations of the flag state. The legislative requirements are to be found in the SOLAS convention chapter V. Examples of **ELB:s** onboard ships are, Deck Logbook, the Engine Log-book, Oil Record Book, Radio Logbook and the Dynamic positioning (DP) Logbook.

The answer to the MINTC question if this proposal is cutting red tape, yes it is! It is providing the Finnish flagged vessels with intelligent traffic tools and freeing it to move into the 21th century. It is also improving the safety since the deck officers will have more time to focus on the navigational watch. Information stored in the **ELB** is also available to be integrated with other reporting systems, for instance to develop a near missing reporting database and also providing Finnish Maritime Administration with extracts from the ship's log when confirming that the operations of the ship is eligible under the act on Enhancing the Competitiveness of Ships engaged in Sea Transport.

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