

This document is a translation of the original assessment in Swedish by SHK of the response to the recommendation. In case of discrepancies between this translation and the Swedish original text, the Swedish text shall prevail in the interpretation of the assessment.

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Assessment of recommendation response from Hermann Lohmann Schiffahrts GmbH

On 2 March 2022, the Swedish Accident Investigation Authority (SHK) published a final report (RS 2022:02) into a fatal workplace accident on 25 March 2021 off Landsort, Stockholm County. In this report, one safety recommendation was issued to Hermann Lohmann Schiffahrts GmbH (RS 2022:02 R1).

Hermann Lohmann Schiffahrts GmbH has responded to the safety recommendation and stated that the shipowner's safety management system meets the international requirements imposed on such a system. Since the introduction of the safety management system in 1988, and up until the accident now in question, no personal injuries have occurred on any of the shipowner's vessels. Since the system was introduced, the shipowner's management have continually optimised the system, which is accessible to all employees in a web-based and a printed version. All employees undergo regular check-ups and training on safety related matters. According to the shipowner disregard for safety procedures and negligence ultimately led to the accident. Some measures have been put in place to improve safety following the occurrence and the shipowner is continually trying to reduce the risk of accidents.

It has been identified in the report that the vessel's safety management system was not effectively implemented and that there were certain deficiencies with the shipowner's safety management system. The purpose of the recommendation is for the shipowner, following the occurrence, to continue working to develop its safety management system in order to obtain continual improvement of the safety culture.

It is evident from the response to the recommendation that, since the safety management system was introduced, Hermann Lohmann Schiffahrts GmbH has been continually working to optimise the system and reduce the risk of accidents. In addition, the shipowner has implemented certain tangible measures to improve safety following the occurrence. SHK views this as positive.

Nevertheless, the fact that safety barriers have been absent to such an extent that the accident could have occurred, irrespective of whether or not there has been negligence, demonstrates that the safety culture has not been at a satisfactory level and that the shipowner's efforts to optimise the system have not been sufficient. Consequently, a more detailed and long-term plan for the way in which Hermann Lohmann Schiffahrts GmbH is working following the occurrence to develop the safety management system in order to obtain continual improvement of the safety culture needs to be reported in order for the recommendation to be deemed fully implemented. The response must therefore be regarded as partly adequate (Closed – partly adequate response).

Best regards,

Jenny Ferm
Chair Accident Investigations