

DNV GL have reviewed the Marine Investigation Report - Slutrapport RS 2016:03 "FINNTRADER – Serie av tillbud till sjöss på sträckan Malmö - Travemünde under tiden den 28 mars 2013 till den 11 mars 2014" Diariern S-35/14 and can provide you with a response to the DNV GL recommendations as follows:

**Ref. RS 2016:03 R6:**

The STA instructions for informing the Flag under the agreed legislation, at the time the incidents were first informed to DNV GL, were not duly followed by DNV GL. The DNV GL instructions, past and present, have correctly reflected the intentions of the Flag agreement legislation. The DNV GL survey station that were made aware of the incident and responsible for the surveys have been reminded of their obligations to immediately report to the TSA all detainable deficiencies.

For minor statutory findings not rectified at the time of survey with CA issued and for detainable deficiencies these are to be reported in writing to the STA.

**Ref. RS 2016:03 R7:**

The intention when issuing a Condition of Class is not to take into consideration possible postponement nor give exceptionally long correction periods. Postponement should only be given if all findings have been addressed and adequate remedial measures are taken that are properly documented. This is the current established practice as stated in governing DNV GL documents.

After numerous incidents on the vessel had happened the owners eventually informed DNV GL and the initial condition of class was issued. Thereafter, the control and monitoring system has been continuously subject to upgrades, but without completely solving all issues. In hindsight it might have been more appropriate to issue a condition of class to rectify all issues before further trading rather than to give several postponements.

**Ref. RS 2016:03 R8:**

DNV GL follow a common training and qualification scheme for surveyors in accordance with IACS Procedural Requirement PR 07. The surveyors training and qualifications will determine the surveys for which they are selected and authorised to perform. In general a surveyor is to conclude on whether or not compliance with applicable rules and regulations has been achieved.

Surveys of the vessel were undertaken by an experienced qualified surveyor who did request expert support from DNV GL Høvik when findings affecting the control and monitoring systems were made known. It is in our opinion that adequate surveyor competence has been utilised for verification of the work and assistance by DNV GL experts has been provided when and where deemed necessary.

The task of carrying out the installation work and upgrading of the control and monitoring system is the responsibility of the owner and their sub-contractors/suppliers.

**Ref. RS 2016:03 R9:**

The DNV GL requirements for reporting and communication according to Flag state agreements are registered and continuously updated on FlagIT, an internal electronic data

base. The Flag state requirements are to be checked on FlagIT and followed by the surveyor when carrying out survey jobs.

We trust that the above is to your satisfaction.

Vänliga Hälsningar / Best regards  
for DNV GL Sweden AB

**Ulf Engdahl**

**Station Manager, Maritime Sweden, Gothenburg & Malmö**  
**DNV GL - Maritime**

E-mail [ulf.engdahl@dnvgl.com](mailto:ulf.engdahl@dnvgl.com)

Mobile +46 70 389 9251 | Direct +46 8 5879 4084

[www.dnvgl.com](http://www.dnvgl.com) | [LinkedIn](#)



DNV and GL have merged to form DNV GL - Read more here: [www.dnvgl.com/merger](http://www.dnvgl.com/merger)