

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.

DNV GL Sweden AB

SHK's report RS 2016:03

SHK published on 13 April 2016 final report RS 2016:03, which concerned a series of incidents at sea on board the passenger ship FINNTRADER along the route Malmö-Travemünde during the period 28 March 2013 to 11 March 2014.

In the report, a total of nine recommendations were issued, five of which were addressed to DNV GL. In the first of these recommendations, DNV GL was urged to endeavour in its supervisory activities in the maritime sector to ensure that incident reporting from ships to the supervisory authority in accordance with applicable rules and regulations (RS 2016:03 R6) is adhered to. DNV GL's response indicates that the classification society has established that the instructions in terms of DNV GL's reporting to the supervisory authority have not been followed in this case and that the concerned parties have now been reminded of their responsibilities. Naturally, this is positive. What the recommendation was intended to highlight, however, was that the classification society should also endeavour in its supervisory activities to ensure that the *ships* should report accidents and incidents in accordance with laws and government regulations. The recommendation can therefore not be considered to have received due attention.

DNV GL was also recommended to consider establishing procedures for how long or under what circumstances a Condition of class can be extended (RS 2016:03 R7). From the response to the recommendations, it is clear that the classification society does not consider the case to have been handled in accordance with established practices or in accordance with the intentions of the policy documents. According to the classification society, it would in hindsight have been better to issue a Condition of class which entailed that all problems should be rectified before the ship could be recommissioned, instead of granting FINNTRADER repeated extensions of the conditional period. Naturally, it is positive that the classification society has gained this insight. The response does not however clarify whether DNV GL has given more consideration to changing or clarifying the procedures in terms of extensions Conditions of class, in order to avoid the occurrence of similar incidents in future. The recommendation can therefore only be considered to have partly received attention.

DNV GL is also recommended to review its procedures for ensuring relevant competence is used in the approval and inspection of supervised entities (RS2016:03 R8). In its response, DNV GL has described its training and qualification programme. It is explained in the description that the inspectors' training and qualifications determine which inspections and investigations they are authorised to carry out

The response also clarifies that it is DNV GL's perception that relevant competence was available in the case in question. The response does not, however, clarify whether DNV GL has considered reviewing its procedures in order to ensure that inspection activities are carried out by individuals with the correct competence. The response can therefore only be considered as somewhat satisfactory, though perhaps the response should be interpreted to mean that DNV GL sees no need of changes to the current procedures.

Finally, DNV GL is recommended to clarify within its organisation the division of responsibility and channels of communication between the classification society and the supervisory authority, and regulate reporting to the supervisory authority (RS 2016:03 R9). In its response, the society presents how reporting to and communication with the supervisory authority is managed in their internal database. The response does not, however, explain what the society has done to further clarify the division of responsibility and channels of communication between the society and the supervisory authority for the employees and to ensure that the rules and regulations for accident and incident reporting are well established internally. The response to the recommendation can therefore not be considered satisfactory.

In summary, DNV GL's response to SHK's recommendations can only be considered partly satisfactory.

Kind regards,

Helene Arango Magnusson
Chair of the Investigation