

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

Statens Haverikommission
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The Swedish Transport Agency's response to SHK's final report RS 2016:03

FINNTRADER – Series of incidents at sea along the route Malmö – Travemünde during the period 28 March 2013 to 11 March 2014

The Transport Agency hereby provides responses to the recommendations issued by SHK in the final report referred to above.

Recommendations to the Transport Agency:

RS 2016:03 R1

Within its supervisory activities for maritime operations, both during inspections and surveys and in connection with an accident or incident, ensure incident reporting is conducted in accordance with applicable rules and regulations.

RS 2016:03 R2

Increase knowledge within the maritime sector of what elements a good safety culture comprise and, in conjunction with supervisory assignments for the maritime sector, work towards a better safety culture on board ships.

RS 2016:03 R3

Within its organisation, clarify division of responsibility, the duty to report and the channels of communication between the Transport Agency and classification societies.

RS 2016:03 R4

Ensure the authority uses authorisation and means at its disposal (incl. orders and fines) to uphold maritime safety.

The Transport Agency's response:**RS 2016:03 R1**

During the remaining training sessions given by the Transport Agency's inspectors, we intend to emphasise the matter of incident reporting. These sessions will take place on 12-13 September and 5-6 December. Additional sessions may be planned as required.

The Transport Agency and the officially recognised organisations (classification societies) hold annual conferences. The Transport Agency will hereafter take up any recommendations issued to the authority concerning delegation to officially recognised organisations as a point on the agenda for the aforementioned meetings. During the meeting held in winter/spring 2016-2017, the incident reporting and applicable rules and regulations will thus be discussed.

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RS 2016:03 R2

In order to increase knowledge within the maritime sector regarding what elements are comprised by good safety culture, the Transport Agency is already conducting a number of initiatives and more are planned.

The Transport Agency's competence centre for Human Factors/People, Technology, Organisation-related matters has conducted development work for all modes of transport regarding safety culture, based on an action plan¹. The purpose of this work is to promote a systematic and uniform assessment of this during supervision. At present, work is underway to develop a new plan of action that includes how the Transport Agency will work with matters of safety culture within the supervisory activities during the 2017-2018 period. This is a continuation of the work on safety culture conducted in accordance with the previous action plan.

This action plan is intended to increase knowledge and understanding of the benefits of a good internal safety culture at the Transport Agency during the first stage, to then in the next stage disseminate this knowledge throughout the industry via our inspectors.

¹ Action plan for safety culture, Proposed improvements for the Transport Agency's work with safety culture in supervisory activities 2013-2015 (TSG 2013-400)

The Transport Agency will have the Institute of Transport Economics in Norway (TØI) conduct a research and innovation project *Development of organisations' safety culture* (TSA 2016-191) with the purpose of increasing knowledge on the potential effects of various measures (methods, tools, working methods) on developing organisations' safety culture. This kind of knowledge can improve the Transport Agency's chances of influencing our licence holders' safety culture. The research and innovation project will continue for one year starting autumn 2016 and include all modes of transport, i.e., even marine.

One project at the authority which was completed in spring 2016 (TSG 2013-819) was intended to investigate the links between different aspects of safety culture and a selection of the rules and regulations for some supervisory areas for all modes of transport. Continuation of the work is currently under discussion.

Work is also underway to translate the Transport Agency's brochure², containing a description of what safety culture entails, into English. The intention is to ensure the information is also available to non-Swedish-speaking parties in the maritime sector.

During the Transport Agency's sector-wide seminar on 6-7 April 2016, the question was asked as to whether there was interest in a seminar on safety culture. There was a clear interest and the Transport Agency is now planning a sector-wide invitation to a seminar on safety culture in autumn 2017.

The Transport Agency wrote an article regarding why safety culture should be included in supervisory work for the publication *Sjötendenser*, which came out in spring 2016. The Transport Agency will also regularly write about safety culture in its information leaflet "Transportstyrelsen informerar Sjöfart" [The Transport Agency Informs the Maritime Sector], which is intended for those working on board ships and with safety issues in shipping companies.

In order for the maritime sector to work towards an improved safety culture on board ships, in conjunction with supervisory assignments, the Transport Agency's competence centre will continue to provide a course twice per year for new inspectors, part of which will look at safety culture. In December 2016, theoretical training in safety culture will also be provided to inspectors who are to work with PNF (Project Nationella Föreskrifter [Project National Regulations]). A more practically oriented course is planned for autumn 2017.

In addition, a project was started in 2016 which is intended to produce a survey tool for ship inspectors in order to facilitate the assessment of safety culture during inspection and in order to contribute to the establishment of a systematic assessment.

² Safety Culture – The Transport Agency's definition and description of important aspects of good safety culture. Brochure 2014.

RS 2016:03 R3

The procedure for communication with the officially recognised organisations, *Management of communication with recognised organisations* (TSG 2014-1437), shall be reviewed and firmly established in the Transport Agency's own organisation. Special training sessions for the Transport Agency's inspectors will be held in winter/spring 2016-2017 with an emphasis on understanding of the contract and the division of responsibility.

RS 2016:03 R4

In spring 2016, the Transport Agency decided on new procedures for managing shortcomings discovered during the inspection of ships or shipping companies or via the absence of periodic supervision; *Description of procedure for the management of shortcomings and submission of supervision results to appropriate personnel on board ships and in shipping companies* (TSG 2016-419) and *Description of procedure for the issuance, extension and annulment of certificates for ships* (TSG 2015-1740).

Following a supervisory assignment in which shortcomings are revealed, the Transport Agency orders the shipowner to rectify the shortcomings by a set date. If the shortcomings are not rectified in time, the ship's certificate may be annulled. The same applies if the periodic supervision (annual or interim inspection) has been missed. Since the introduction of the new procedures, the Transport Agency has issued close to 100 orders concerning the ships and shipping companies where the Transport Agency's own inspectors conduct the supervision.

The Transport Agency is currently working to ensure that the aforementioned description of a procedure (TSG 2016-419) shall also be applied with respect to the ships and shipping companies using a recognised organisation for supervision. This work may lead to additional procedures being produced in order to ensure that management and communication regarding shortcomings discovered by the organisations – both between the recognised organisations and the Transport Agency and within the agency – functions satisfactorily. These procedures will be communicated with the organisations and may lead in the long term to a revision of the delegation agreements in order to ensure adequate management of shortcomings discovered by the recognised organisations.

Decisions in this case have been made by Head of Unit Simon Posluk. Head of Unit Gunnar Ljungberg, Section Heads Fredrik Hellsberg, Adam Löf and Charlotte Billgren, lawyer Maria Sakari, Human Factors/People, Technology, Organisation Analyst Anna Tullberg, Management Strategist Henrik Tunfors and Accident Coordinator Patrik Jönsson all participated in the final administration of the case; the latter also acting as reporter.

[signed]
Simon Posluk
Head of Unit