

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.

Swedish Transport Agency
Civil Aviation and Maritime
601 73 NORRKÖPING

The Swedish Accident Investigation Authority's report RS 2020:01

On 23 June 2020, the Swedish Accident Investigation Authority published the report RS 2020:01 concerning an engine breakdown and subsequent fire on board the ro-ro passenger vessel Peter Pan on 9 July 2019 en route from Rostock to Travemünde.

A total of four safety recommendations were issued in the report, two of which were addressed to the Swedish Transport Agency. The Transport Agency has submitted a response to these safety recommendations.

Recommendation RS 2020:01 R1

The Transport Agency was initially recommended to draw attention to the problem of cross-flooding rules in combination with risks of the spread of fire and take suitable action to raise the matter, also internationally (RS 2020:01 R1).

In its response, the Transport Agency initially confirms that the rules for cross-flooding and fire integrity, respectively, may in some cases conflict with one another. However each regulatory framework now offers exemptions from the basic requirements and the safety functions can thus exist in parallel, even if engine rooms are placed in compartments connected via cross-flooding pipes. One way to address the criticised problem is for an authority and shipping company to choose to analyse whether it wants to choose A-0 integrity, for example by putting a vent in the cross-flooding pipes, or whether it is more advantageous to have an open flow in the event of water penetration and do without A-0 integrity.

Passenger vessels over 120 metres that have three or more main fire zones and were built in 2010 or later are now subject to the rules on *Safe Return to Port*. Consequently, the Transport Agency makes the assessment that the problem is resolved for these vessels through explicit requirements concerning redundancy. At present, the Transport Agency therefore primarily sees a need to acknowledge the problem when building new vessels that are not subject to the rules on *Safe Return to Port*, as well as through internal information campaigns.

Finally, the Transport Agency sees that the accident investigation report will automatically be discussed in the IMO subcommittee, *Implementation of IMO Instruments (III)* when the report is uploaded to GISIS and subsequently analysed by the pertinent working group.

SHK is positive that this matter is being discussed internally within the Transport Agency through information campaigns. With regard to the matter of drawing attention to the problem internationally, SHK is of the opinion that it is not sufficient for the report to be reported, as happens to all other reports, to GISIS. The reporting to the GISIS database does not automatically result in the report being analysed by a working group. SHK would have preferred it if the Transport Agency had considered taking an alternative, more active course of action such as taking the initiative to submit some form of statement to IMO. In light of this, the overall response to this recommendation may be deemed partially satisfactory.

Recommendation RS 2020:01 R2

The Transport Agency is also recommended to take action nationally and internationally in order to draw attention to the problem of combined crankcase ventilation (*RS 2020:01 R2*).

According to the response to this recommendation, the Transport Agency intends to inform the industry about the importance of ensuring the functionality of oil mist detectors in combined crankcase ventilation. A *Safety Alert* published on the agency's website may also be pertinent. The Transport Agency will also inform members of staff internally about the problem for the purpose of highlighting the problem in conjunction with conversions and new builds, in conjunction with surveys and inspections conducted by recognised organisations (recognised classification societies).

At the international level, the Transport Agency has responded in the same manner, namely that the authority sees that the accident investigation report will automatically be discussed in the IMO subcommittee, *Implementation of IMO Instruments (III)* when the report is uploaded to GISIS and analysed by the pertinent working group.

SHK is of the opinion that the course of action the Transport Agency is planning to take at the national level is very much consistent with the recommendation and that the recommendation has been implemented in this respect. However, with regard to the action planned at the international level, SHK is of the opinion that this course of action is not sufficient for the same reasons stated in respect of recommendation RS 2020:01 R1. This is because the reporting to the GISIS database does not automatically result in the report being analysed by a working group. All in all, the response to the recommendation may be deemed only partially satisfactory.

Best regards,

Helene Arango Magnusson
Chair Accident Investigations

Copy to