

**SMT Cement Ltd s.p. z.o.o.,
Ul. Chrobrego 48,
Sopot, 81-723,
Poland.**

Swedish Accident Investigation Authority,
P.O. Box 6014,
SE-102 31 Stockholm,
Sweden.

Your ref: S-238/18

15 January 2020.

Dear Sirs,

Serious Accident onboard mv “ENVIK” (IMO number 8208464; call sign SGBD) 27 November 2018.

We refer to your letter and final report dated 17 October 2019 which sets out the circumstances of the tragic accident which befell our respected and valued crew member onboard the mv “ENVIK” during unberthing operations from Dagerhamn on 27 November of last year. We are again extremely grateful to the Swedish Accident Investigation Authority for sharing their report and recommendations with us and write to record the actions which we have taken and implemented throughout the fleet.

While we may never know with any certainty the final events, which led to our crew member being fatally injured we have recognized that there are improvements which may be made to our procedures including our SMS. In the immediate aftermath of the incident a circular was sent to all vessels prohibiting the use of ship’s crew in assisting mooring operations from shore, which would normally be undertaken by linesmen or stevedores.

As stated in our letter of 20 September 2019 each Master in the fleet has undertaken a complete risk analysis review onboard for all mooring, unmooring and anchor handling operations, paying special attention to the minimum number of crew at each mooring station. In this respect it should be noted that the minimum number of crew at each mooring station, forward and aft, is not to be less than two. Consequently, the SMS has been amended to ensure that there must be at least two crew members at each mooring station during berthing and unberthing operations and, if the circumstances warrant it, additional crew are to be utilized.

A further risk analysis assessment has been undertaken on the use of winches. This has highlighted that only one rope may be brought onboard at a time using the winch. The winch must be manned and operated by one of the mooring team for that mooring station at the winch control panel. Any additional ropes used are to be brought onboard prior to the departure of the vessel.

In the aftermath of the accident and from the subsequent investigation it was discovered that areas of the deck around the winches may become very slippery, especially in cold, freezing weather conditions. To remedy this, we ensured that these areas have been painted with anti-slip paint to reduce the likelihood of someone slipping.

It is appreciated that making changes to the SMS is insufficient if neither those changes nor the SMS itself are adhered to. Therefore, to address this issue we have used this incident during our SMT Cement Fleet seminar, held between 10 – 11 October 2019, to highlight to the senior crew members and superintendents attending the safety precautions which must be taken during mooring operations and the potential ramifications if these are not followed.

The entire SMT Cement Fleet was internally audited during 2019, with the Envik audit taking place on 16 October 2019. During these audits focus was placed on the safety measures which are to be employed during berthing and unberthing operations. To ensure that these lessons are not forgotten the superintendents, who are required to visit their vessels within the fleet at least three times per year, have been tasked to observe and report on safety routines and in particular to maintain the safety routines/requirements with regards to mooring operations as per the SMS. This includes observing the proper prior planning and execution of these operations from the risk assessment, which should take into account weather conditions, slip hazards and manning requirements; the pre-operation brief to ensure all involved know the berthing/unberthing plan and how it will be executed; plus ensuring that during the operation there are adequate communications available to all involved in the operation and sufficient crew, never less than two, are at the mooring stations.

The above represents the key measures which have being brought into the SMS system to ensure that as far as possible there is no re-occurrence of the sad incident of 27 November 2018.

Yours faithfully,



Peter Newell
For and on behalf of
SMT Cement Ltd s.p. z.o.o.