

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.

Swedish Accident Investigation Authority

*Via e-mail: info@shk.se*

Stockholm, 16 October 2025

**Re. Supplementary response to statement regarding the Swedish Accident Investigation Authority's final report 2025:05**

**1 INTRODUCTION**

In the final report referred to in the heading the Swedish Accident Investigation Authority (SHK) directed one safety recommendation at WhiteWater West Industries Ltd. (WhiteWater). The safety recommendation had the following wording:

*WhiteWater is recommended to take action to enhance compliance with established rules and procedures relating to safety. This action should include the promotion and maintenance of a good safety culture (see Section 2.3.2). (SHK 2025:05 R5)*

WhiteWater responded to SHK's statement on 21 July 2025. In a letter to WhiteWater of 2 September 2025, SHK also stated that despite WhiteWater having responded to the safety recommendation and having described the measures implemented and planned in conjunction with the reconstruction of Oceana, the measures cannot be deemed to correspond to the measures SHK has recommended that WhiteWater put in place. Furthermore, SHK was of the opinion that the measures were described in a very general way and that it was not evident how the company intended to work with the promotion and maintenance of a good safety culture. In light of this, SHK's opinion was that it was not possible to deem the safety recommendation to have been implemented (Concluded – unsatisfactory response).

In light of this, WhiteWater is supplementing its response as set out below.

**2 WHITEWATER'S SAFETY CULTURE**

WhiteWater works on the basis of a group-wide safety policy (Safety Policy – Commitment to Safety) that establishes a working method characterised by clear leadership, employee engagement, systematic risk management and a well-resourced safety committee the goal of which is to exceed applicable safety requirements and for zero accidents to occur ("zero harm"). This orientation is translated operationally through the activities set out below and the associated documentation, which is applied consistently in the company's international projects.

WhiteWater bases its work on a Site Advisor handbook that describes in a practical and tangible manner the company's work with safety culture and safe implementation in projects. It is used in all of WhiteWater's projects all around the world and describes a behaviour-based safety culture that is kept alive through means including recurrent Safety Toolbox Talks, leadership by example, structured discrepancy management, practical rules for risky elements (Hazard Identification & Risk Assessment) and supportive systems (training, policies, document flows). The aim of the whole is to make "correct behaviour" simple, visible and traceable in each project. For example, Safety Toolbox Talks are a forum that is used in each project that involves addressing and discussing safety issues once a week and documenting this in a Safety Toolbox Meeting Document. The Site Advisor handbook and underlying documents are reviewed and updated continually.<sup>1</sup>

"Safety. Always." is an explicit lodestar and part of the company's guiding principles and assignments. Safety is linked to leadership, ethics and customer deliveries – not as a subsidiary activity, rather as a foundation for the implementation of the project.

### **3        SPECIFIC INFORMATION ABOUT OCEANA**

SHK maintained in its final report the importance of ensuring that staff have the correct prerequisites for the work that is to be performed and that WhiteWater should take action to enhance compliance with established rules and procedures relating to safety. In the work to rebuild Oceana, WhiteWater has implemented a number of measures to enhance compliance with established rules and procedures and that promote and maintain a good safety culture.

For example, a need for increased knowledge about applicable rules and procedures concerning the work environment at the workplace was identified. With the aim of enhancing compliance with rules and procedures concerning safety, WhiteWater has engaged a Swedish work environment consultant who will support WhiteWater during the project period in matters relating to Swedish work environment legislation. This includes questions concerning work environment from Liseberg and NCC in their capacity as developer and BAS-P/BAS-U, respectively. Furthermore, an HSE (Health, Safety, Environment) plan for Oceana is under production. The HSE plan describes how the systemic work environment management shall be applied in the workplace in accordance with Swedish work environment legislation and contains a range of activities that are to be implemented with a certain frequency, such as safety inspection, incident reporting etc. One example for the purpose of creating the correct prerequisites for the work that is to be performed is a checklist that is being drawn up of the training and the certificates that all employees and subcontractors who work for WhiteWater must have and which training courses must be completed in Sweden. The checklist is shared with the developer and

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<sup>1</sup> The Site Advisor handbook contains 29 safety questions and was last updated in January 2020. Safety Tool Box Talks was updated in November 2023. Hazard Identification & Risk Assessment was updated in September 2025. The installation manual has been updated a number of times, most recently in January 2025.

BAS-U. Below are further examples of tangible measures that have been implemented in the reconstruction of Oceana.

### 3.1 Tangible measures that have been implemented

- a) A Swedish work environment consultant contracted by WhiteWater who will provide support regarding questions from Liseberg (developer) and NCC (BAS-P/BAS-U) regarding work environment during planning and execution.

Provides, when required, documentation in accordance with the Work Environment Act (WEA) and applicable regulations.

Ensures transfer of knowledge to WhiteWater's two site advisors regarding their responsibilities with respect to subcontractors, NCC's role as BAS-P/BAS-U and the role of the developer (Liseberg) ahead of the start of production.

Conducts monthly site visits during the execution phase for revision/follow-up and targeted support where needs are identified.

- b) A Swedish consultant contracted by WhiteWater who will provide administrative support for management and implementation of the ID06 system.
- c) Updated "Installation Manual" regarding the installation work that is to be performed. It should be noted that work on installation of diversion pipes or electrofusion will not be performed.
- d) Updated "Subcontractor Safety Acknowledgement". All of WhiteWater's subcontractors have to undertake in writing to comply with all safety rules issued by WhiteWater, public authorities, project managers etc.

### 3.2 Planned measures and activities

WhiteWater is planning the measures below for the purpose of enhancing compliance with established rules and procedures concerning safety and to promote and maintain a good safety culture.

#### *Planning (prior to start)*

**HSE plan for Oceana (Health, Safety, Environment).** Produced and being processed; describes how systematic work environment management shall be applied in the workplace in accordance with Swedish work environment legislation.

**Fire protection work.** A documented fire prevention and intervention programme for the installation phase at Oceana with Swedish requirements as its basis, clear roles, practical procedures, recurrent training/exercises and fully traceable documentation. The aim is to establish a structured working method for fire prevention and intervention in the event of fire during WhiteWater's preassembly and installation at Oceana, in

accordance with Swedish requirements. Specific risky elements that are included: Hot work that requires a Swedish certificate, permit, fire watcher and post-completion monitoring.

**Training matrix & authorisations.** A comprehensive Excel list that describes all actors (employees and subcontractors) who will be working for WhiteWater, what training and which certificates they must have and which training courses must be completed in Sweden. Shared with the developer and BAS-U.

**Preparations for work & risk analyses.** Revised preparations for work and risk analyses for the purpose of ensuring a more comprehensive and structured description of risks and the work.

#### *Production – monthly-weekly-daily*

The HSE plan includes a structured programme for safety culture with recurrent activities and frequency:

Safety kick-off in advance of the start of the project. All those who work for WhiteWater have to participate and learn about the safety culture.

Tool Box Talks. A brief, structured safety review of various safety issues, normally 5–15 minutes before the work starts, that is documented.

Safety inspections and management inspections with documented follow-up of measures.

Monthly reports concerning trends, such as current risk areas, current events in the project etc. issued by a work environment consultant.

Rescue/evacuation exercises.

Continual reporting of incidents/observations on the construction site.

Daily checks on protective equipment.

#### *Health & support for skilled workers*

Medical checks in those cases where these are required.

Induction of new employees and new subcontractors with regard to safety on the construction site and in the project. The same requirements are imposed on subcontractors as on staff.

Rapid feedback on reports (“you saw – we acted”).

Monthly award of “Safety Example” in order to reinforce the desired behaviours.

#### *Follow-up & improvement*

Monthly report regarding the frequency of Tool Box Talks and attendance, observations, lead-time for measures, PPE (Personal Protective Equipment) compliance, safety inspections.

Annual systematic work environment management – review with decisions.

## 4        **SUMMARY**

WhiteWater is conducting a goal-oriented effort to maintain and enhance the safety culture within the company and in all projects around the world. The basic premise is the principle of "Safety. Always." and a behaviour-based working method in which leadership, staff engagement and clear procedures create safe workplaces. Supporting documentation, such as policies, practical tools, recurrent dialogue, measurement and acknowledgement of safe behaviours, ensures that safety management is conducted consistently, transparently and measurably. Documents are revised and updated continually.

With regard to the reconstruction of Oceana, the goal is for all essential and required documentation to be present and for all training courses to be completed before the work begins. This is being achieved through transparent cooperation with BAS-U and the developer. Each member of staff who will be working in the project shall be guaranteed the correct prerequisites for working safely until such time as the facility is handed over to Liseberg. As described above, WhiteWater has implemented a range of measures for the purpose of enhancing compliance with rules and procedures and promoting and maintaining a good safety culture, and has also decided on a number of measures that have been initiated or will be implemented shortly. To conclude, it is the view of WhiteWater that, through this supplementation, the company has provided a satisfactory response to SHK's recommendations.