

Mr. J.R.V.A. Dijsselbloem,
Chairman Dutch Safety Board

Bergen, March 9, 2021

Comments to recommendations

Odfjell Management has been requested to comment on the recommendations given in Dutch Safety Board's report "Oil Spill Port of Rotterdam" within one year or release of the report. We also refer to our previous comments to the draft report in our letter dated January 30, 2020.

The report refers to June 23, 2018, where the Chemical Tanker Bow Jubail collided with a jetty in Rotterdam's port. As a consequence of this collision, a hole was punched in the ship's skin adjacent to the single-walled fuel tank, through which a total of 217.4 tonnes of heavy fuel oil poured into the water.

The report issues ten recommendations regarding preventing (oil) spill in the Port of Rotterdam to all the different parties involved. In this letter we share our comments and how we have followed up the recommendations.

Odfjell's general comment on follow up of the incident.

Immediately after the incident, Odfjell started our investigation to identify the root-cause, barriers, and possible actions and improvements. Odfjell has reviewed all relevant procedures and training to ensure all learning points from this incident are taken and reviewed and implemented measures to prevent such incidents from happening again. The investigation reports and findings from the incident have been shared within the fleet. Odfjell has a continuous focus on improving and developing technology, communication, cooperating, training, and procedures. Experiences from the incident have been included in this constant improvement from the incident that occurred.

It is a continuous work to improve and learn from all experiences, incidents, near misses, and experiences from others, so it will not be possible to present all details of the specific recommendations' follow-up. The recommendations are also addressed to other parties.

Odfjell supports the recommendations given by the Dutch Safety Board

Comments and follow up of recommendations.

One recommendation are addressed Odfjell Ship Management and Loodswezen Rotterdam-Rijnmond (Pilotage Service)

Recommendation 2: Ensure that it is clear to all parties how a maneuver is to be undertaken and exactly what is expected of them during that manoeuvre. In the framework of Bridge Resource Management (BRM), actively make this information available to all crew members and check regularly that the BRM system is applied.

Odfjell's comment: Odfjell supports the recommendation. As per the recommendation, the pilot will also be a part of the bridge team when the ship is under pilotage, and it is vital that the plan is communicated and understood by the whole team.

All Navigational officers in Odfjell have compulsory training on Ship Simulator and Bridge Teamwork training (IMO Model Course 1.22). All our bridge Officers including the Master must have refresher training on same not exceeding five years. In addition to the BRM training, the bridge Officers knowledge and competence are regularly assessed during both internal audits and inspections and through external audits and inspections.

Two recommendations are addressed to the Port of Rotterdam Authority, DHMR, and Odfjell Ship Management

Recommendation 3: For all seagoing vessels visiting the port, ensure that before they enter the port area, the port authorities know whether the vessels are equipped with single-walled fuel tanks.

Recommendation 4: Draw up an inventory of the key safety risks involving seagoing vessels with single-walled fuel tanks for (the area surrounding) the port and take measures to mitigate these risks. These must include but not be restricted to:

- *identifying and creating (guidelines for) appropriate moorings;*
- *manoeuvring support by (specific types of) tugboats;*
- *the timing of mooring operations in relation to water levels and the shape and cargo of the vessel*

Odfjell's comment: Odfjell supports the recommendations. The recommendation is directed to the Port, but the recommendations have also been adopted by Odfjell. Odfjell will always disclose whether the vessel is equipped with single-walled fuel tanks.

Odfjell has a specific procedure for navigation, with the pilot covering responsibilities and specific actions to be taken. This is one of the procedures that has been updated with learnings from the incident. In this procedure, it is listed topics to be briefed and discussed with the pilot. The recommendations 3 and 4 are covered in this procedure, through a list of topics to be briefed/discussed. A specific checklist must be signed by the pilot and master and retained for six months.

Odfjell has previously commented that the Pilotage service communicated in the Dutch language. In the Odfjell procedure for navigation under pilotage, Odfjell has stated that master should require that communication within the bridge team and/or external parties should be in English.

Best regards,
for ODFJELL MANAGEMENT

 **Odfjell Management AS**

Øistein H. Jensen
Chief Sustainability Officer