Van: @scf-group.com> Verzonden: vrijdag 4 februari 2022 6:49 Aan: @@onderzoeksraad.nl> Onderwerp: RE: Safety recommendations Dutch Safety Board

Dear

In response to the attached letter, we hereby confirm that your recommendations were thoroughly studied and appropriate preventive actions were developed and implemented in the Company's safety management system. We apologies for the slight delay in responding within the requested time frame.

Robust actions were taken to improve awareness of the seafarers and shore personnel with regards to the safety of the mooring operations, especially in locks for avoiding similar incidents in the future. In addition to the above, please note our comments to the each of recommendations:

3. Ensure that it is clear to all persons involved how the lock passage will be undertaken. Make a precise agreed and verified determination of the final position in the lock.

SCF Comments: It is clear now to all onboard personnel how the lock passage should be undertaken. The agreed and verified determination of the final position in the lock has been provided. Pursuance of this was achieved via SMS procedures, Master-Pilot exchange, and detailed risk assessment. Particularly, mooring lines are only allowed to run out only after the vessel is stopped at mooring position;

4. Ensure that whenever agreements are reached on board about the distribution of tasks during sailing and maneuvers, these agreements are respected and that they do not conflict with the formal role and responsibility of the various persons involved according to their own discipline

SCF Comments: All required agreements on board the vessel about the distribution of tasks during sailing and maneuvering were reached. Such agreements never contradict the formal role and responsibility of the shipboard persons involved according to their duties. This was achieved by implementing appropriate assignment and supervision of the tasks, work planning meetings, newly re-designed mooring operation pre-job safety briefing, and detailed risk assessment which should exclude potential human failures that may lead to the near-miss or even incident.

5. Ensure that during mooring line handling, crew members only undertake tasks after they have been issued with the appropriate instructions by a superior. Ensure that a start is only made on placing mooring lines under tension following the issuing of an instruction by the ship's officer in command on the bridge.

SCF Comments: During mooring line handling, crew members only undertake tasks after they have been issued with the appropriate instructions by a supervising officer. Relevant SMS was amended with clear robust order on placing mooring lines under tension following the orders of the ship's officer in command on the bridge, moreover, the mooring lines are only approved to run out only when the vessel is stopped at mooring position.

6. Ensure that officers who are expected to physically supervise the safety of crew members are always able to give priority to this task.

SCF Comments: The officers, who are expected to supervise the safety of crew members are always giving priority to this task. Pursuance of this was achieved via SMS procedures, work planning meetings, newly re-design mooring operation pre-job safety briefing, and detailed risk assessments.

7. In areas with snap-back zones, identify or create safe workstations where those aboard cannot be hit by mooring lines and ropes if they snap back; mark these safe workstations in a recognizable manner and organize the work processes involving mooring lines and ropes in such a way that operations are always undertaken from these safe workstations.

SCF Comments: As per industry best practices, the SCF SMS has determined the entire mooring decks as a high-risk area where snap-back could potentially occurred the appropriate training, familiarization, awareness, and robust control measures are in place which serves as barriers to protect from harm to the personnel. The exhaustive written guidance was implemented into SMS via detailed risk assessment, work planning meetings, mooring operation

pre-job safety meetings.

Thanks and best regards,



From:	@Onderzoeksraad.m>
Sent: 28 January 2022 17	:51
то:	@scf-group.com>
Subject: Safety recomme	ndations Dutch Safety Board

Dear

On 5 November 2020, the Dutch Safety Board published its report titled 'Fatal outcome following parting of mooring line. Lessons learned from the accident on board the RN Privodino'. In this report, the Dutch Safety Board included a number of recommendations. Five of these recommendations are addressed to SCF Management Services Dubai.

The report, with the accompanying letter, was sent by email on 4 November 2020 to SCF Management Services Dubai. In the letter is stated, following Article 73 of the Dutch Safety Board Act, the organisation at which the recommendation is directed shall define its position in this respect within one year after the day of publication to the Dutch Safety Board.

To date, the Dutch Safety Board has not received a response from SCF Management Services Dubai. The Board would like to verify that SCF Management Services Dubai has indeed not sent a response, and subsequently when we can expect the response.

Please note that your position with regard to these recommendations will be published on the website of the Dutch Safety Board. The Board will also publish a reaction to all received positions on its website.

Attached to this letter you will find the recommendations and the letter sent on 4 November 2021. Should you have any questions regarding this letter, do not hesitate to contact us.

Thank you in advance for your response.

With kind regards,



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