

For your guidelines please find our answers on your recommendation:

1. Ensure that the ship is manned and equipped in such a way that all work on board can be carried out safely. This incident shows that the following conditions must be taken into account:
 - a. Bring the crew into line with the strength described in ship-specific procedures.
 - ➔ This is continues process. Vessel's crew constantly trained and monitored via Technical department visits; internal audits; external audits.
We share lessons from other vessels and provide training materials for on board Practice (e.g. Seagull safety videos on various ship – specific operations)
 - b. Ensuring that the regulative rest hours for the crew members are guaranteed.
 - ➔ Clear procedures are given to the fleet in regards of the work and rest.
The compliance is checked during Internal Audits and External audits.
Crewing department verifying work and rest hours remotely via reporting system in line with ISM implemented procedure.
 - c. Ensuring clear communication on board by requiring a walkie-talkie for all crew members.
 - ➔ The clear communication is ensured on board by appointing persons in charge for communication with the bridge (e.g. during mooring). The procedure is in line with the revised and approved manning plan. In addition we can confirm that there is sufficient amount of walkie-talkie on board to provide it for each member of the mooring team.
 - d. Ensure a clear warning method for working in and near a snap-back zone.
 - ➔ Same is ensured via visual marking and checked during ship visits. Last time checked in June 2021.
2. Promote that crew members are sufficiently safety-aware and safety-competent to prevent accidents on board and to act appropriately in the event of imminent danger. This incident shows that several methodologies are desirable to achieve effective behavioural change, such as:
 - a. Regular discussion of procedures with the crew so that they understand them and see them as necessary. Review of procedures where they are no longer appropriate.
 - ➔ This is continues process. Procedures are discussed on regular basis via Safety Committee Meetings.
Regular revision of the procedures via the standard ISM tools like risk assessment.
This is checked during Internal and external ISM audits.
 - b. Talk through potential incidents (based on experience, earlier or elsewhere) which may occur on board and have the crew explore how to respond to them. This should include exercises and simulations.
 - ➔ Information is shared with the fleet on regular basis via circulars; on board visits; internal periodical magazine.
 - ➔ There was a plan to organize 2-3 seminars with the crew at their home countries (Russia, Ukraine; Philippines)
To address safety practice. Due to 2020 – 2022 pandemic era this plan had not been realized so far.
 - c. Use the risky situations identified on board and discuss them during safety meetings.

The premise is to call each other to account for actions that do not comply with the safety agreements, regardless of rank or seniority.

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This is checked during Internal and external ISM audits.

d. Organising specific training and exercises to further develop skills that appear to be underdeveloped.

➔ Crew is certified with STCW certificates ensuring minimum qualification standards.

On top of it crew provider (e.g. Marlow) has internal courses (ship general safety; personal safety, safe morning operations, etc.)

which are followed by crew. As well as safety bulletin newsletter shared with the crew on regular basis.

On board the vessel Captain and Chief Officer are tasked to promote safety culture and help crew to develop.

Crews who are not qualifying and appeared to be reluctant to safety standard are signed off.

e. Devote specific attention to training and supervision of trainees

➔ The existing procedure before the accident in relation to the cadets handling had been reviewed and revised. Clear instruction given to the Captain how to deal with the cadets ensuring boundaries and considering cadets qualification and experience.

Should you have any question please feel free to ask.

Met vriendelijke groet / Best regards,

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