

RESPONSES RECEIVED ON DRAFT REPORT 'FATAL OUTCOME FOLLOWING PARTING OF MOORING LINE - LESSONS LEARNED FROM THE ACCIDENT ON BOARD THE RN PRIVODINO'

No.	Party	Chapter/ Section	Text to be corrected	Argumentation	Corrected	Response from the Dutch Safety Board
1	MAIC	1 / 1.1 Section 2	The ship's flag state, Cyprus (through the Marine Accident and Incident Investigation Committee or MAIC), participated in the investigation, as substantially interested state.	An agreement has been made between the Dutch Safety Board and the MAIC, that the Netherlands will be the Lead Investigating State and that Cyprus will participate as substantially interested state. For this purpose, documentation had been forwarded to the investigator in charge on 28/06/2018.	Yes	
2	CNB NZKG	1 / Explanatory block 'Mooring procedure in the lock at IJmuiden'	'Lock master/lock keeper' (5x):	'Lock keeper'	Yes	
3	CNB NZKG	1 / Explanatory block 'Mooring procedure in the lock at IJmuiden'	'Port of Amsterdam.....the employer of the lock'	Central Nautical Management North Sea Canal area (CNB Noordzeekanaalgebied). Because the CNB Noordzeekanaalgebied itself employs no personnel, the tasks of the CNB Noordzeekanaalgebied are undertaken by the Harbour Master's Division of the Port of Amsterdam'	Yes	
4	CNB NZKG	1 / Explanatory block 'Mooring procedure in the lock at IJmuiden'	'Via walkie-talkie, he can pass on instructions from the pilot to the boatmen on the lock wall.'	It is not the task of the mobile man to pass on instructions from the pilot to the boatmen. The pilot can communicate directly with the boatmen. In your report, this is also included in the task description of the pilot.	Yes	
5	Het Loodswezen	1 / 1st Paragraph	This did not apply to those persons standing by the winch	It was not unexpected for them	No	The report is a correct representation of the facts
6	Het Loodswezen	1 / 4th Paragraph	'The Pilotage Service'	'The registered pilot'	Partially	The Pilotage Service is an actor, just like the registered pilotage service. 'Registered pilot' has been added.
7	Het Loodswezen	2 / Table	'150'	'1500'	Yes	
8	Het Loodswezen	2 / Table	'None'	'Multiple pilot journeys made on board sister ships'	Yes	
9	Het Loodswezen	2 / 1st	'The Dutch Pilotage Service..... Scheldemonden'	New text proposal: 'The Dutch Pilotage Service is a professional organization according to public law. The organization operates a professional (De Nederlandse Loodsencorporatie) and a corporate organization (Nederlands Loodswezen B.V.). There are four regional maritime pilot associations: Noord; Amsterdam-IJmond, Rotterdam-Rijnmond and Scheldemonden. The registered pilots in the various regions together form the Regional Pilots Association (RLc)'	Yes	

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10	Het Loodswezen	2 / 2nd	'are in principle.....from a pilot'	Delete and insert following text: 'pursuant to the Shipping Traffic Act and underlying regulations are required to consult a pilot'	No	Adds nothing relevant to the case.
11	Het Loodswezen	2	'Independent'	Delete	Yes	
12	Het Loodswezen	2	'Independent'	Delete	Yes	
13	Het Loodswezen	2 / 4th	'lock.....'	Supplement text with: 'The Captain hereby took a deliberate risk with such a large and heavy vessel. The interplay on board is crucial for the safe completion of the mooring procedure.'	No	The addition would add a subjective analysis to the part of the report that discusses the course of events. For that reason it is not taken on.
14	Het Loodswezen	2 / 1st	In the final sentence: delete the word 'winch'	Is the same as a winch	No	In strictly formal terms this comment is correct. However, on page 12, it is explained that multiple (mooring line) winches and a warping head can be connected to the winch. To remain consistent in describing the different parts of the mooring gear, the word 'winch' should be left here.
15	Het Loodswezen	2 / 2nd	First sentence, add after walkie-talkie: 'in Russian'. The following sentence to be added after checklist: 'The pilot was not duly informed'.		No	Adds nothing relevant to the case. The pilot has no position in the implementation of this specific shipping procedure.
16	Het Loodswezen	2 / 3rd	Second sentence: 'delete mooring line winch'	Is the same as a winch	No	See reaction to point 14.
17	Het Loodswezen	2 / 3rd	On deck, should be 'on the deck'		Partially	The mooring lines are laid 'on the deck', not 'on deck' The word 'the' has been added between 'on' and 'deck'.
18	Het Loodswezen	2 / 3rd	'Sufficient space'	What is 'sufficient' space?	Yes	
19	Het Loodswezen	2 / 3rd	After the third sentence insert: 'this was not communicated to the registered pilot'		No	Adds nothing relevant to the case. The pilot has no position in the implementation of this specific shipping procedure and there is no direct relationship to the accident.
20	Het Loodswezen	2 / 2nd	'First always.....against the side of the lock'	This sentence is incorrect. It depends on the specific circumstances. This is not always the case, and it can be risky to sail onto the spring with such a heavy vessel. Therefore please delete this first sentence.	Partially	The use of the word 'always' is too definitive. However, the investigation revealed that 'as a rule' the forward spring and stern line are first sent ashore and wrapped around a bollard. Text will be adjusted.
21	Het Loodswezen	2 / 4th	10 should be 12 metres	The distance is 12 metres	Yes	
22	Het Loodswezen	2 / 1st	170 metres should be 150 metres	Who suggested it is 170 metres? According to Qastor, at 21:03:19 it was still 150 metres to the gate. Approximately 30 seconds later, the bow line was placed around the next bollard. Distance between fore part and gate approximately 135 metres. Distance still to be covered to agreed position in the middle of the lock 23 metres. In that respect, the pilot issued the instruction at the correct moment that the forward spring should be sent ashore.	No	Distances, positions, speeds, times and their interrelationships were obtained from the VDR data of the vessel, including also verbal communication on the bridge. This with the exception of the distance the ship was still removed from the midpoint of the lock at the moment the mooring line broke (method added to report). The report is a correct representation of the facts.

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23	Het Loodswezen	2 / 2nd	Incorrect reproduction of the course of events because the Captain was a traffic participant. Text proposal: 'At the moment the spring is sent ashore, the Captain knows that the ship must slow down; there can be no uncertainty on this point. All the more because he was a traffic participant very experienced with passing the Noordersluis lock.	The pilot instructed the Captain that the vessel should be moored in a position more or less in the middle of the lock. This instruction was also passed on via the walkie-talkie to the mooring teams. The pilot added, for the Captain's information, that when the vessel had reached its intended final position, the cargo manifold would be in line with a parked car on the quay wall, see page 9. When the forward spring is passed ashore, this means: slow down the ship within 25 to 30 metres; every captain and pilot in the world is aware of this fact. There can be no possible misunderstanding.	No	The report describes the factual events. This reaction includes an element of personal analysis by the pilotage service, which does not belong in this part of the report.
24	Het Loodswezen	2 / 3rd	Incorrect. Delete the word 'experienced'. Why this addition? This is a value judgement about a single person, suggesting that others are more or less experienced.	If he <u>was able</u> to see that the forward spring was placed around the bollard then he would <u>also have been able to observe</u> the forward speed and would never have placed the spring around the tension drum to start tensioning. How is it possible for an experienced boatswain, on his own initiative, to start tensioning the forward spring while in contact with the Captain and the third officer and being required to follow orders from these persons?	Yes	The word 'experienced' has been deleted.
25	Het Loodswezen	2	After 'before transferrin.....drum' add: 'and wound three turns around the tension drum'.	This is crucial information that should not be missing from this paragraph.	Yes	
26	Het Loodswezen	2 / 2nd	Delete 'apparently'	Apparently? This is an interpretation and is out of place in an investigation report.	Yes	
27	Het Loodswezen	3 / 3rd	Replace 1st sentence with: 'The pilot was justified in expecting that the Captain would start slowing down the vessel at the moment the pilot indicated that the forward spring could be sent ashore. 2nd sentence: add to this sentence: the 'final position the pilot <u>and the Captain</u> had in mind'.	When the forward spring is passed ashore, this means: slow down the ship within 25 to 30 metres; every captain and pilot in the world is aware of this fact. There can be no possible misunderstanding. The Captain is a traffic participant, the captain deliberately made this choice. Insert the underlined.	No	The report is a correct representation of the investigation findings. Parts of the text have been changed for clarification purposes.
28	Het Loodswezen	3 / 3rd	Barrier 1 should be: Not tensioning on the forward spring with the vessel travelling forward without instruction from the third officer	This page should be altered. In respect of the second sentence. How is this demonstrated? The forward spring was sent ashore at the right moment, with at least 20 metres still to sail before the middle of the lock, in the final position the ship halted 20 metres in front of the middle of the lock. At the moment of breaking, the distance to the middle of the lock was around 8 metres (Qastor 21:04:19 forward spring taut).	No	The analysis by the Dutch Safety Board confirmed the failure of this barrier. The distance from midships to the middle of the lock at the moment of breaking was determined on the basis of hard facts. For further clarification, how this was determined is added to chapter 2. All moments and distances were then derived using data and voice recorders from the VDR.
29	Het Loodswezen	3 / 4th	First sentence: 'fails to explain clearly..... bollard'	How was this ascertained? It is not possible that the Captain did not see this; he had an unhindered view from his position.	No	The report is a correct representation of the investigation findings.
30	Het Loodswezen	3 / Last	'at relatively high speed'	In absolute terms not too much speed, see Qastor and certainly not too much for the safe completion of the manoeuvre	Yes	
31	Het Loodswezen	3 / Table	The table is incorrect; the distance covered does not correspond with the average speed	Distance covered in 44 seconds is 20 metres. This equates to a speed of 0.88 knots. Self-measured on Qastor. I then arrive at a distance of 18 metres.	No	Distance covered in 34 seconds, not in 44 seconds. The calculation is correct. The table takes account of a margin of + or - 1 metre. This data originates from the VDR.

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32	Het Loodswezen	3	It was however determined that he had not been informed by the pilot of this standard working method. See supporting arguments.	Given his experience with more than 50 passages through the lock at IJmuiden, the Captain was certainly familiar with this standard working method. (On page 22, the boatswain with the same amount of experience as the Captain indicates that he too was familiar with the standard working method.)	No	It was determined that the Captain was not informed. This is not denied in this reaction. The text will not be altered.
33	Het Loodswezen	3	First sentence: replace 'he' with 'Captain'. Last sentence 'relatively high speed'	The word 'he' creates uncertainty The speed was acceptable for the safe completion of this manoeuvre.	Yes	
34	Het Loodswezen	3	First sentence: Until the moment the ship entered the lock, the pilot was a traffic participant 'working together' and 'specifically because they were working together' to be deleted In respect of the summary under three 'potential risk' should be 'potential danger'		Partially	Argumentation missing. The word 'risk' has been replaced by 'danger'.
35	Het Loodswezen	3 / 3rd	This page should be altered. Paragraph 3; delete this paragraph and replace with: 'Even if the Captain chooses option 3, the pilot must always offer advice in the event of potential danger. However, the Captain is also a traffic participant and as such responsible for the safety of the ship, the crew and the cargo during the lock passage'. With regard to a and b: This summary does not match the reality and the statement on page 9, paragraph 2, which suggests that the mooring position, which was more or less in the middle of the lock, was communicated by the Captain to the mooring teams. A and b should be duly adjusted. In respect of summary a: The Captain may be expected after 50 lock passages to be familiar with the lock procedure.		Partially	The information contained in the report is correct. Both bear responsibility. The pilot has the responsibility for issuing correct and timely advice to the Captain, even if there is not (yet) a potential danger. The Captain has the responsibility for the safety of the ship, the crew, the cargo, the environment and other shipping traffic. The comments and argumentation on this point and point 27 gave grounds to further consult the file on this point, and to once again assess the interpretation of the findings. This led to an alteration and focusing of the text and a further focusing of the (sub)conclusions.

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36	Het Loodswezen	3 / 5th	Re. the first sentence: At the same time 'through to' was placed. The part of the sentence: The associated risks have remained long concealed, is incorrect.	Which risks were intended here and who has determined this fact? It is generally the pilot who, as a traffic participant, moors the ship, whereby the Captain operates the rudder, bow thruster and propulsion on the pilot's advice. Thanks to the knowledge and skill of the pilot, risks were reduced to a minimum. The risks were therefore not concealed; they were as good as eradicated.	No	The fact that the accident could take place, as determined by analysis, demonstrated that the risks were latently present.
37	Het Loodswezen	3 / 6th	Summary: Must be adjusted according to the comments above. What is stated here is incorrect.		Partially	See reactions from Dutch Safety Board to reactions nos. 27 through to 40.
38	Het Loodswezen	3 / 1st	2nd sentence: 'The investigation has..... forward spring'.	Which investigation? This text states that no figures are recorded. Nonetheless, it subsequently emerges from investigation that something is known. In our opinion this is a conflict. It seems unlikely that this happened weekly. That would mean that an experienced pilot with more than 20 years' service would at least experience this on an annual basis. And that is certainly not the case.	No	The fact that the commenting party is not aware of sources does not mean that they do not exist. Sources for an investigation by the Dutch Safety Board are protected by law and in certain situations cannot be released.
39	Het Loodswezen	3 / 3rd	The text about the sea lock in Terneuzen should be deleted.	This is an incorrect comparison because the sea lock in Terneuzen is far smaller and there are far fewer sea passages each year by seagoing ships. The exchange of seawater and freshwater is different, applying difference forces to the ship.	No	The procedure in the sea lock was not primarily selected on the basis of the size of the lock or the number of passages. The report states that due to the low number of breaking mooring lines, it is interesting to refer in the report to the locking procedure with regard to determining the final position in the lock in Terneuzen.
40	Het Loodswezen	3 / 4th	The text about the sea lock in Terneuzen should be deleted.	If multiple ships are planned in a single passage, in IJmuiden, the final position is indicated by the lock master and undertaken by the mobile man on the lock wall. In addition, the lock in Terneuzen is always fully booked with seagoing shipping and inland shipping. The northern lock in IJmuiden is not used for inland shipping as a rule; the middle lock and southern lock are available for that purpose.	No	The reason for referring to the locking procedure in Terneuzen is not based on the number of ships planned in the lock for each passage. The primary aspect is the way in which all parties involved together precisely indicate what the final position is to be, and when it is reached.
41	Het Loodswezen	3 / 2nd	First sentence should be deleted.	The comments made here about the crucial moment in our opinion do not refer to the crucial moment. The crucial moment was when the boatswain, on his own initiative, started tensioning the forward spring, in such a way that there were three turns around the tension drum, while the ship was still moving forward.	No	The report is a correct representation of the investigation findings.
42	Het Loodswezen	3 / 3rd	The comment about 'not routine' is strange because it is by definition the rule on board ships.	Is this the statement by the Captain/crew? In our judgement, it is very exceptional and contrary to good seamanship.	No	The Dutch Safety Board issues no comments on statements by individual persons.

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43	Het Loodswezen	3 / Last	Adjust and change the 3rd sentence in the sense that the following is included: 'At that moment, the third officer had only one task, namely monitoring the forward spring'. The other tasks only applied thereafter.	Passing on the distance to the lock gate is unnecessary; the Captain and pilot can easily read off that distance on the lock wall. The only thing the third officer should be focusing on is the forward spring and indicating whether ropes should be hauled in or paid out. What was the mooring team leader looking at?	No	The report lists what the investigation discovered about the tasks of the individual crew members.
44	Het Loodswezen	3 / 2nd summary	This should be adjusted: See comment in the cell above.		No	See reaction from Dutch Safety Board to reaction no. 43.
45	Het Loodswezen	3 / 4th	The wording 'fixed'. This sentence should be altered.	What does the word 'fixed' mean? If it was a fixed element, it should be preceded by the word 'a' and if something else is meant, the text should be adjusted. Text is currently too confusing (applies to the Dutch text)	Yes	
46	Het Loodswezen	3 / 7th	'It.....at that moment'	Strange sentence because he had followed all training provided and had been present during the safety briefing prior to the mooring in the lock in IJmuiden.	No	The report is factually correct here. The motorman was killed outright. It was not possible to determine what he was or was not aware of shortly before the accident.
47	Het Loodswezen	3 / 2nd summary		It is clear in every mooring configuration where the snap-back zones are located. This is not only determined in the event of potential danger. See page 16, Figure 8. Snap-back zones of the forward spring at the moment it broke.	No	Because the entire foredeck was designated a snap-back zone on the RN Privodino, the marking did not indicate the location of these zones in specific mooring configurations. On this aspect, the report is a correct reproduction.
48	Het Loodswezen	4 / 3rd	This section must be adjusted.	See comments in chapter 3 analysis, pages 18, 19 and 20.	Partially	See reactions from Dutch Safety Board to reactions nos. 27 through to 40.
49	Het Loodswezen	4 / 3rd	Text about the mooring team leader is incorrect and must be adjusted.	See comments made on page 22 on this point.	No	See reaction from Dutch Safety Board to reaction no. 43.
50	Het Loodswezen	4 / last	Text about snap-back zones is incorrect and must be adjusted.	See comments made on page 24 on this point.	No	See reaction from Dutch Safety Board to reaction no. 47.