



*Product Shipping & Trading S.A.*

Tuesday, January 07, 2019

To: Sandy Hook Pilots Association  
Kind Attn: Mr. Chris Maglin

Dear Sir,

Please find hereunder root cause analysis, as well as corrective and preventive actions established plan regarding the "Sandy Hook Pilot Boarding Deficiency Report" raised for our managed vessel M/T Undine on March 29, 2019:

*Deficiency:*

*Poor Condition of gangway.*

*At somepoint gangway was damaged, steps are at angles or bent, whole gangway is warped. Wires for gangway are in way of handropes.*

**Root Cause:** After relevant investigation carried out, it was revealed that prior vessel's arrival to the port of New York it had been encountered heavy weather; resulting the port side accommodation ladder (although secured) to be damaged/distort.

Worth to mention that, in line with Company's established procedures, all necessary preparations/precautions had been exercised prior voyage's commencement and during her crossing ocean passage; resulting no any further damages to be experienced to the rest of main deck's fittings, piping, equipment etc.

**Corrective Actions:** As soon as the damage occurred, a relevant on-board assessment had been carried out and responsible departments were advised accordingly. Due to limited time of vessel's staying in New York, was not possible to be carried there all the necessary repairs.

Meanwhile, our Technical Department had planned all the appropriate actions and, to the very first convenient vessel's call, subject gangway would be landed ashore, repaired, tested as necessary and subsequently returned and mounted in position.

In the meantime, and until ladder's repairs, vessel had been instructed to issue a relevant Risk Assessment for identifying all risks and implementing all the applicable risk mitigation measures.

As part of the adopted risk mitigation measures, it had been verified the following:

- a. The starboard side accommodation ladder; the portable gangway & all Pilot Ladders (3 pieces, all of adequate length) were in good condition and readily available to be deployed.
- b. Case was regularly followed up in cooperation with the vessel's assigned Superintendent until its proper closure.
- c. Gangway's case was properly communicated to all responsible Officers and Crew.
- d. Master had been instructed to conduct an extraordinary Crew meeting / training.  
During the course of the abovementioned session, an extended review/discussion was carried out to the topics included into the Company's Intergraded Management System PART-G, Chapter 6, paragraph 6.9 "Pilot Ladders used in combination with accommodation ladders".



*Product Shipping & Trading S.A.*

- e. During the next attendance of the assigned Superintendent, as part of his regular visit, among other tasks discussed along with the Master/Deck Officers & Deck Hands subject case had been analyzed in detail. It was underlined and clearly understood – by all participants - that proper condition and safe deployment of Pilot boarding arrangements are of paramount importance and no shortcuts can be accepted. Furthermore, attending Officers and Crewmembers were challenged and showed being familiar with proper inspections/deployment of the Pilot boarding arrangements.

*It is now confirmed that repairs of the port side ladder have been completed as necessary. Furthermore, both accommodation ladders had been inspected & load tested – to the satisfaction of the attending Classification Society's Surveyor – during vessel's recent Dry Docking, in October 2019. Relevant certification had been produced & placed onboard, for any future reference. In addition, ladders' wires had been renewed in line with the applicable Company's retirement scheme.*

**Preventive actions to avoid reoccurrence:** Case was circulated to the fleet requesting the following:

- a. To be carried out an additional to the PMS (Planned Maintenance System) inspection of all the vessel's pilot boarding arrangements for confirming that they are well maintained and in good physical & operational condition
- b. To be carried out an additional training to all responsible Officers and Crew for confirming that they are well trained to the Pilot Boarding arrangements deployment and they are well familiar with their inspection/maintenance as necessary.

Subject shortcoming was brought also to the attention of all Office responsible Superintendents (both Marine & Technical) at the first – after reporting – Office Meeting. They were alerted to be extra vigilant during their on-board attendances, to do in detail on-the-spot physical inspections of all relevant equipment / fittings and to challenge responsible personnel for discussing thoroughly the good seamanship practices, effective communication, safety precautions and the proper deployment techniques which should be always be followed.

**Note: Please find attached the following:**

1. Pictures illustrating subject gangway's present condition
2. Relevant Classification Society records attesting gangways' proper condition
3. Specialized workshop's gangways' loadtest certificate