

Bahamas Maritime Authority

Report of the investigation into the grounding of HEDLO on Urter Island, Norway,

25 December 1999

The Bahamas Maritime Authority investigates incidents at sea for the sole purpose of discovering any lessons which may be learned with a view to preventing any repetition. It is not the purpose of the investigation to establish liability or to apportion blame, except in so far as emerges as part of the process of investigating that incident.

It should be noted that the Bahamas Merchant Shipping Act, Para 170 (2) requires officers of a ship involved in an accident to answer an Inspector's questions fully and truly. If the contents of a report were subsequently submitted as evidence in court proceedings relating to an accident this could offend the principle that a person cannot be required to give evidence against himself. The Bahamas Maritime Authority makes this report available to any interested parties on the strict understanding that it will not be used as evidence in any court proceedings anywhere in the world.

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SUMMARY

- 1.1 The Bahamian registered, single hold, coaster HEDLO was on passage from Rotterdam to Sandnes, near Bergen when, at about 2230 hours, 25 December 1999, she ran aground on Urter Island, about eight miles West South West of Haugesund, Norway.
- 1.2 The vessel had loaded a cargo of steel products at Duisberg and Rotterdam departing from the latter at 2200 hours local time (UTC + 1 hour) 23 December 1999.
- 1.3 The weather on the passage had been poor when the vessel sailed and it deteriorated to a South Westerly severe gale or storm during 24 and 25 December.
- 1.4 The Master opted to take a course to the West of Karmo Island passing through Sira Fjord the exposed coastal area to seaward of Karmo island but East of Utsira Island.
- 1.5 The available evidence indicates that there were lax navigational practices in use including the absence of a clear Passage Plan and accurate plotting of observed positions. The Master, who was on watch at the time, failed to appreciate the precise position of the vessel as well as the course and speed that was being achieving. Having observed a position at 2200 that evening the Master either did not properly plot that position on the chart or failed to allow for the ongoing track of the vessel from that position before he made a course alteration in order to pass between Urter and Utsira Islands. As a result of that failure the vessel grounded on rocks that formed the perimeter of Urter Island.
- 1.6 The vessel struck the rocks with sufficient force that, with the aid of the prevailing wind and sea conditions, the vessel remained in the same position that it finally settled that night. HEDLO was subsequently declared to be a Constructive Total Loss.

PARTICULARS OF VESSEL

2.1 HEDLO was a geared general cargo coaster, registered in Nassau, Bahamas, of welded steel construction. She had a raised forecastle and poop, one cargo hold and two cargo hatches. The accommodation and machinery spaces were situated aft. She had the following principal particulars:

•	Official Number	-	725390
•	IMO Number	-	7124879
•	Length overall	-	74.83 metres
•	Length BP	-	69.55 metres
•	Breadth	-	10.00 metres
•	Depth	-	5.75 metres
•	Gross Tonnage	-	1,092 tons
•	Net Tonnage	-	577 tons
•	Deadweight	-	1,254 tonnes
•	Call Sign	-	C6MV9

- 2.2 She was powered by Lister Blackstone Mirrless four stroke, single acting, eight cylinder main diesel engine that developed 736 kW (1,000 bhp) and which drove a single controllable pitch propeller. She had two main generators that developed a total of 80 kW. The nominated maximum speed was noted on the Register to have been 11.5 knots although the normal sea speed was stated to have been 9.5 knots. At the latter speed the bunker consumption was normally about 2.9 tonnes per 24 hours.
- 2.3 The vessel was built in 1971 at Orens MV, Trondheim, Norway. At the time of the incident she was owned by Actinor Short Sea II AS of Oslo, Norway, managed by Continental Ship Management of Karmsund, Norway and chartered to Wilson Euro Carriers AS of Bergen, Norway.
- 2.4 The vessel was first registered in the Bahamas in 1995 and was entered with Det Norske Veritas Classification Society. At the time of the casualty she complied with the all statutory and international requirements and certification.
- 2.5 The vessel's Safe Manning Document required a total crew of five persons being a Master, Chief Mate, Chief Engineer and two seamen. At the time of the casualty there were seven persons onboard being the above plus one Electrician and one apprentice. The nationality of all on board was Polish except for the Chief Mate who was Estonian. The Master had stated that he was very experienced in the navigation of similar vessels to HADLO to and from ports on the West Coast of Norway.

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- 2.6 HEDLO was last subjected to a Bahamas Maritime Authority Annual Inspection at the Port of Rotterdam on 28 May 1999. No deficiencies were noted.
- 2.7 She had received Port State Control Inspection prior to that Bahamas Annual Inspection on 17 December 1998 where no deficiencies were noted.

NARRATIVE OF EVENTS

3.1 All times given in this report, unless specifically noted to the contrary, are in the form of the 24 hour clock without any additional annotation and in the local times of Germany, Netherlands and Norway, which was UTC plus one hour. Most details in this narrative originate from the evidence of the Master, although a log book was recovered from the vessel into which was recorded some of the observed positions of the vessel.

3.2 Cargo Loading Ports

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- 3.2.1 HEDLO arrived at Duisberg, Germany, on 21 December 1999 where a cargo of ferro manganese was discharged. Loading of a cargo of about 900 tonnes of steel products (plates, coils and some pallets with steel products) was commenced on 22 December 1999 and completed on 23 December 1999 at 0450. The vessel then departed bound for Rotterdam, where she arrived at the waiting area at 1410, 23 December 1999, berthing at 1710 the same day. About 100 tonnes of steel products were added to the cargo by 2000.
- 3.2.2 The vessel's crew secured the cargo, using chains, hooks and dunnage throughout the loading between 2015 and 2145. 28,000 litres of gas oil bunkers were loaded at the same time. The total quantity of bunkers onboard at departure Rotterdam was approximately 48 tonnes. The vessel departed Rotterdam at 2200, 23 December 1999 bound for Bergen. The departure draft was 4.52 metres aft and 3.61 metres forward.

3.3 Departure from Rotterdam and the early part of the Voyage

- 3.3.1 The wind conditions upon departure were South or South Westerly of Beaufort force 5 when near to the Rotterdam pilot station. During the following 24 hours, the winds increased up to Beaufort force 8 or 9. Weather forecasts were received in Duisberg and Rotterdam by Navtex and television. The forecast winds were from a South or South West direction of Beaufort force 7 to 9, with occasional gusts up to Beaufort force 10. The winds were later predicted to back to the East.
- 3.3.2 The Master kept morning and evening watches at 0600 to 1200 and 1800 to 2400. The Chief Mate kept the intervening watches. During the voyage, there were no reported problems from the vessel or its equipment. It was uneventful until the evening of 25 December 1999 when the Master gave the agent at the next port an ETA at the Merstein pilot station of 0300 on 26 December 1999.
- 3.3.3 The Master had decided to make an approach on a Northerly course towards the Southern end of Karmo Island in order to have the option of taking the narrow, sheltered inshore route to the East of that Island and thus gain protection from the Westerly weather. This would have involved employing a Pilot south of Kvitsøy, at the Southern entrance to Skudenes Fjord.

3.4 Events from 1800, 25 December 1999 up to the time of the Grounding

- 3.4.1 The Master returned to the bridge a few minutes before 1800 in order to keep his evening watch of 25 December 1999. There was an Able Seaman on the bridge with him. The winds were still South Westerly, Beaufort force 9 but the forecasts then, and over the following two hours, informed him that the weather should improve, with winds backing so as to come from South or South East with a reduction in force. The vessel had been making approximately 9.5 knots during the 1200 to 1800 watch. At 1800, a GPS position was logged as 58° 42.2'N, 005° 16.8'E. The Master then changed course from 000° true to 349° true in order maintain the option of whether to take a pilot at Kvitsøy or proceed on a course further to the West, without pilotage assistance.
- 3.4.2 The next logged position of 58° 00.2'N, 005° 10.0'E was timed at 2000. The Master stated that he made the decision to proceed further west of Kvitsøy and to seaward of Karmo, without a pilot, at 2100. The accuracy of this timing is commented upon in paragraphs 4.4 to 4.6. The observed positions, other estimated positions and the estimated track of the vessel are depicted on the chart extracts contained in Appendices I and II to this report. The known track up to the 2200 position is shown, up to that indicated time, as a double black line.

- 3.4.3 At 2135 HEDLO sailed between the Ferkingstadøyane and Karmo Islands, passing the former at what the Master described as "a safe distance." A reconstruction of the logged positions suggests that distance to have been 0.7 nautical miles or about 1,300 metres to windward of the vessel. The prevailing weather conditions were persisting with reported winds from the West or South West at Beaufort force 9 and seas of about 5 or 6 metres height. The Master stated that he was considering passing to the east of Urter but after plotting a position at 2200 hours, logged at 59° 17.8'N, 005° 05.0'E, he decided to change the course to 320° true to pass west of that island and its associated dangers. He stated that he did not alter the heading further to the West in order to avoid subjecting the vessel to more severe rolling and a possible shifting of the cargo. He added that the course change was a compromise between maintaining speed and the safety of cargo.
- 3.4.4 A plot of that 2200 position and an estimated plot of the track of the vessel back from the grounding position indicates that the course alteration was not completed until between about 2212 and 2217. The variation in those times depends upon what, if any, set and leeway was affected the vessel. This is discussed further in section 4.4 of this report.
- 3.4.5 The Master stated that he observed part of the island of Urter on the radar screen at about 2230 although sea clutter obscured some of those echoes. This report concludes that the timing of this observation was a few minutes before 2230. He added that a plotted position at about that time indicated that the vessel was closer to Urter than he expected after the 2200 course alteration.

- 3.4.6 The Master had periodically used the searchlight, located on the roof of the bridge, to check the sea state and to try to assess the visibility. He switched this searchlight on to confirm the position of Urter and observed, what he subsequently described as, a sight similar to seas hitting rocks and seas pounding against Urter Island. He did not state at what angle from the bow of his vessel that sighting was although he still assumed that the distance to Urter was safe. Nevertheless, he stated that he felt uncomfortable. He corrected the automatic steering to head "a few degrees more to the west." However, before any heading change was made he felt what he described as the vessel hitting a wave after which it nearly stopped. This he later understood was when the vessel grounded.
- 3.4.7 There had been no reduction of the engine revolutions or the propeller pitch before that time. It is therefore inferred that, as the vessel had been making good about nine knots before the 2200 position, after the course alteration she was making good at least eight knots when she ran aground.
- 3.4.8 The grounding was reported in parts of the media to have occurred at 2250, local Norwegian time. The Master's statement indicated that it was at about 2235. As referred to above, this report concludes that it was close to 2230.

3.5 Events after the Grounding

- 3.5.1 After the grounding the vessel had turned to starboard and the main engine had stopped by itself, possibly due to overload. At between about 2240 and 2245 the Master stated that he sent a distress signal by VHF, Channel 16. Further information given to Bergen Radio included the position of 59° 21.68' North, 005° 01.80' East, the number of crew and the cargo.
- 3.5.2 Bergen Radio informed HEDLO that another vessel was in the area. The crew members gathered on the bridge and were instructed to don on their survival suits and be ready to abandon the vessel. The other five crew members had joined the Master and the watchkeeping Able Seaman and were assembled before any formal alarm was raised on board. The Chief Engineer informed the Master that it was impossible to restart the main engine. The weather conditions prevented the crew from taking any soundings or inspecting the vessel after the grounding.
- 3.5.3 At about 2310, Bergen Radio advised that a rescue helicopter had been despatched. This arrived at 2340 and safely evacuated the crew and the Master, taking them to Stavanger. The Master was able to carry ashore some of the ship's documents, crew passports and certificates.
- 3.5.4 It has been reported that upon arrival in Stavanger the police tested the Master for indications of alcohol. The result was negative.
- 3.5.5 HEDLO remained stranded on the rocks where she grounded and was later declared to be a constructive total loss.

ANALYSIS

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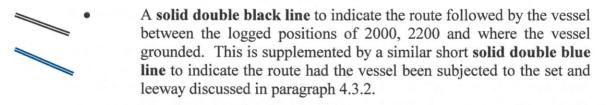
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- 4.1 Weather and Sea Conditions, Passage Plan and a Chart Extract of the Route
- 4.1.1 It was claimed that regular weather forecasts were received via the NAVTEX receiver, supplemented by others from television and coast radio stations. Upon departure from Rotterdam strong South Westerly winds of between Beaufort forces 6 and 10 were forecast with the projection that towards the end of the voyage the wind was going to back to the South East and decrease in strength. With that information the Master stated that he considered the weather conditions were safe to undertake the voyage.
- 4.1.2 During the afternoon and early evening of 25 December, similar forecasts were received indicating that the change of wind direction would occur that evening. During the first part of the evening watch that night the weather persisted with winds from the West or South West at Beaufort force 9 and seas of about 5 or 6 metres height. This estimate was made in darkness using the Master's experience and views of the seas taken with the aid of the vessel's searchlight, which was mounted on the deck above the wheelhouse.
- 4.1.3 No passage plan was recovered from the vessel. The Master's stated intention for the final phase of the voyage was to steam North directly towards Karmo Island. Then, depending upon the weather and the forecast, he was able to decide upon the option of steaming the final part in sheltered waters between that island and the mainland up to and beyond the port of Haugesund after which the final approaches to Bergen could be made, or to pass to seaward of Karmo Island. The former action would have involved engaging a pilot in Skudenes Fjord. The Master was clearly prepared to take this option, from which it can be inferred that it was an expense that the Manager was prepared to incur.
- 4.1.4 The chart in Appendix I, expanded in Appendix II, has been overlaid with the following lines:



- The **solid red lines** mark approximate zones of rocks and dangers adjacent to the course that was followed.
- The **olive green double dashed line** approximately indicates the inshore route to Haugesund and beyond that passes through Karm Sund.
- The **dashed double green lines** indicate possible courses that could have been followed by the vessel to avoid the dangers of the area. (These are discussed in section 4.7 of this report.)

4.2 The Passage to the West of Karmo

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- 4.2.1 The timing of events, as recorded in the Master's statement was confused and, in some places inaccurate. After such a traumatic event as the grounding such errors may be expected but not be criticised. The Master stated that he finally made the decision to take the seaward passage towards Bergen and to proceed to the West of Karmo Island at 2100 that evening. That is a clear error as the vessel was, by that time, immediately West of Skudenes and Jarstein Light House.
- 4.2.2 At 1800, when near the north end of the Traffic Separation Scheme at the logged position 58° 42.2'N, 005° 16.8'E, a course alteration to 349° was made that was sufficient to take the vessel to the West of Karmo. Had the Master decided to take the inshore route through Karm Sund he should have altered to the East before 2000.
- 4.2.3 The Master's statement could not recall the passing distance from Jarstein Light House that was on the starboard beam at about 2100. A reconstruction of the logged positions, reproduced in Appendix I, indicated that distance was about 1.4 nautical miles. He did however state that at 2135 he passed between the Karmo and Ferkingstadøyane Islands, passing the latter at "a safe distance." The plot indicates that distance was about 0.7 nautical miles or about 1,300 metres to windward, as noted in Paragraph 3.4.3.
- 4.2.4 The Master stated that he made the course alteration from 349° to 320° after he plotted the 2200 position. That alteration would therefore have been made some time after the position was taken. There is no evidence that the position was actually marked on the chart although it was entered in the log book.

4.3 Set and Leeway

- 4.3.1 The course steered before that alteration was 349°. However a plot of the 1800, 2000 and 2200 positions reveals that the vessel was making good 351½°, indicating that the vessel was subject to leeway and set of 2½°. The wind and sea at that time had been coming from a relative direction of between about two and four points (20° to 55°) abaft the starboard beam.
- 4.3.2 The course alteration to 320° subjected the vessel to a greater influence from the prevailing wind and sea that would have caused more set and/or leeway. If, for the sake of this discussion, the combined effects of the wind and seas were directly on the vessel's beam after the course alteration, then the side ways forces would have increased by only about 15%. Therefore it could be argued that the most likely set and leeway, after the alteration, would have been about 3° or less. It is, in these circumstances, not possible to precisely predict how much more that leeway and set would have been after the alteration. However even if it was increased to 9°, so as to make good a course of 329°, a multiple of three times the calculated set and leeway, (shown on the chart as a double blue line) the course alteration would not have been completed until 2212; 12 minutes after the position was taken and recorded.

4.3.3 The above scenario shows that the increase of the set and leeway that was experienced after the course alteration is of no material consequence.

4.4 The Time of the Course Alteration from 349° to 320°

- 4.4.1 A plot of the eventual grounding position, run back to intercept the projected 2000 to 2200 course line on reciprocal courses of 320° and 329°, indicates that the course alteration would have become effective at between about 2212 and 2217. On a relatively small vessel, such as HEDLO, a course alteration of 29° would normally be made within one or two minutes. It is therefore reasonable to assert that the alteration was initiated at between about 2210 and 2216.
- 4.4.2 When a 320° line is plotted back from the danger area to the South West of Urter Island (shown as a red pecked line on the charts of Appendix I) it can be seen to intersect the projected 2000 to 2200 course line at a time of about 2210. The vessel would have then been about three nautical miles from the Island. It is therefore evident that had the vessel made good a course of 320°, after that time, without any set or leeway having effect, it would still have run aground on some part of the island.
- 4.4.3 Widening the discussion, even if no set or leeway had been experienced and the course alteration had been completed by precisely 2200, the vessel would have passed only about 0.8 nautical miles to seaward of the danger area around Urter Island. Passing that distance directly to seaward of dangerous rocks on a lee shore in a severe gale, on any ship, is not the practice of a good or prudent seaman. That passing distance to seaward of Urter would have been reduced significantly with the time that would have been taken to make the alteration. Also any delay in making that alteration after 2200 would have further reduced that passing distance until about 2210 when, as referred to in the previous paragraph, the grounding would have been inevitable.
- 4.4.4 The course alteration was completed by at least 2217. There was, therefore, at least 13 minutes between then and when the vessel ran aground.

4.5 The Grounding

4.5.1 The time of grounding was not recorded. This report concludes that it was very close to 2230. There were however other reports that it was as late as 2250. The Master stated that he took a position at about 2230. As referred to earlier, this is considered an understandable error in the Master's recollection of events. He did not record this position but the plot of the recorded positions and their associated speeds indicates that the grounding occurred at very close to 2230 and therefore his position, remembered as being at that time, would, in reality, have been taken a few minutes earlier.

4.6 Actions of the Master: Recording and Plotting of Positions

4.6.1 It is not apparent that any positions were plotted on the chart, even though they were recorded in the log book at two hourly intervals. The Master could not have accurately checked the vessel's position after the course alteration to 320°

was made because such an exercise would have alerted him to the fact that the vessel was further to the North East than he had assumed and drastic avoiding action was required. He stated that he became aware of the danger that his vessel was in shortly before the grounding but there was insufficient time to take any avoiding action.

- 4.6.2 The foregoing indicates that while the Master was recording some of the positions that he was taking from the navigation system, none were being plotted. Had he plotted them on the chart he would have been aware of the vessel's speed and the potential of making the course alteration either as late as it was made or alternatively as close to seaward of Urter Island.
- 4.6.3 The course alteration that was taken after 2200 was either so late that the alteration of course to 320° was insufficient or else the course of 320° was too far to the North to give a safe clearance to seaward of Urter Island and its outlying rocky shoreline.
- 4.7 Actions of the Master: Passage Planning and Course Options Available
- 4.7.1 There is no evidence that any formal, written Passage Plan was in use or even in existence. The Master stated that he had navigated on this coast on very many occasions. His statement of his actions, the choice of courses and the options that he was considering through the afternoon and evening of 25 December indicates that familiarity.
- 4.7.2 He made an approach towards Karmo Island on a Northerly course in order to give himself the option of taking the narrow, sheltered inshore route to the East of that Island and thus gain protection from the Westerly weather. This would have involved employing a Pilot south of Kvitsøy, at the Southern entrance to Skudenes Fjord and serves as an indication that such an option was available to him. In view of the forecast reduction and change of direction of the weather, it was not an unreasonable decision to take the seaward option to pass through the Sira Fjord, East of Utsira.
- 4.7.3 The Master did not make clear what his intended route was after passing between Ferkingstadøyane and Karmo Islands, at about 2135. He had three options available, all of which are indicated on the charts in the Appendices by dashed green lines:
 - Alter course to port, in order to pass to the West of Urter Island, then proceed to the North before altering to starboard to approach Bergen. Had such an alteration been made soon after passing Ferkingstadøyane, a course of about 337° would have been sufficient to pass at least one nautical mile to seaward of Urter. Alternatively, to achieve the same effect, a course alteration to 320° (the same course that was eventually adopted prior to the grounding) taken any time up to 2200, would have taken the vessel within the shaded area on the charts in the Appendices.

- From the 2200 position, steam towards Rövær Island light, heading approximately North within the white sector of the Island light, and to the East of Urter, after which altering course to port to pass to the West of Rövær Island, taking care to avoid the two six fathom (11 metres) patches.
- From the 2200 position, steam towards Rövær Island light, heading approximately North within the white sector of the Island light, and to the East of Urter after which altering course to starboard to pass close to the North West of Kvaløy Island, joining the inshore route towards Bergen that passes close to Haugesund.
- 4.7.4 In the weather conditions the second option of those would be inadvisable as it would have required the vessel to steam, at night with the weather and seas close to the beam through narrow waters that have unmarked shallow patches.

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- 4.7.5 The third option was, with some local knowledge, a possible route to consider as there were several light houses and the courses would have placed the effects of the weather and seas behind the vessel. Anticipation of the sea keeping characteristics of such a small vessel in that situation is a major influence upon a Master's decision whether to take such a route. A Master, with experience of navigation on that coast, will be in the best place to make such a decision. With respect to this report, it is not known whether the Master did consider that option but his action of adopting a course heading towards Urter and Rövær indicates that a route similar to that may have been under consideration and, as such is not criticised.
- 4.7.6 This leaves the first option that was eventually taken. In order to safely follow the seaward route it would have been possible, and indeed advisable, to make an alteration of course to port, at 2135, from 349° to a course between 320° and about 337° (as indicated on the chart in the Appendices by the double green dashed lines and the shaded areas). The longer such an alteration of course was delayed the greater that alteration had to be, thereby causing the vessel's attitude to the weather to be nearer to her starboard beam. Leaving that course alteration until after 2210, 35 minutes after the first opportunity that was available to take such a route, made the stranding of the vessel inevitable, unless the course alteration was greater than that made and a more Westerly course adopted. As indicated in section 4.4 above, the course alteration was not initiated until between 2210 and 2216. This was between 35 and 41 minutes after the first opportunity.

4.8 Action of the Master: After the Final Course Alteration

4.8.1 Having made that course alteration between 2210 and 2216, the Master failed to ascertain that it was having the desired effect or to confirm the vessel's position. The evidence from the Master indicates that it was primarily by intuition when he realised that the vessel was too close to Urter Island and he turned the Bridge searchlight on to discover that he could see the seas breaking over the rocks close to the area that the vessel eventually grounded upon. He then attempted to take remedial action but the vessel ran aground before that became effective.

4.9 Action of the Master: After the Vessel Ran Aground

The Master acted in the proper manner as soon as he realised that the vessel had run aground. He communicated with the rescue authorities and ensured that his crew were assembled and in the safest position from where they were eventually evacuated by helicopter.

4.10 Search and Rescue

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The Norwegian rescue services responded with admirable speed after Master's Distress call to Bergen Radio.

CONCLUSIONS

5.1 HEDLO ran aground at 2230 25 December 1999, on rocks that formed part of Urter Island, Norway, in position 59° 21.68' North, 005° 01.80' East.

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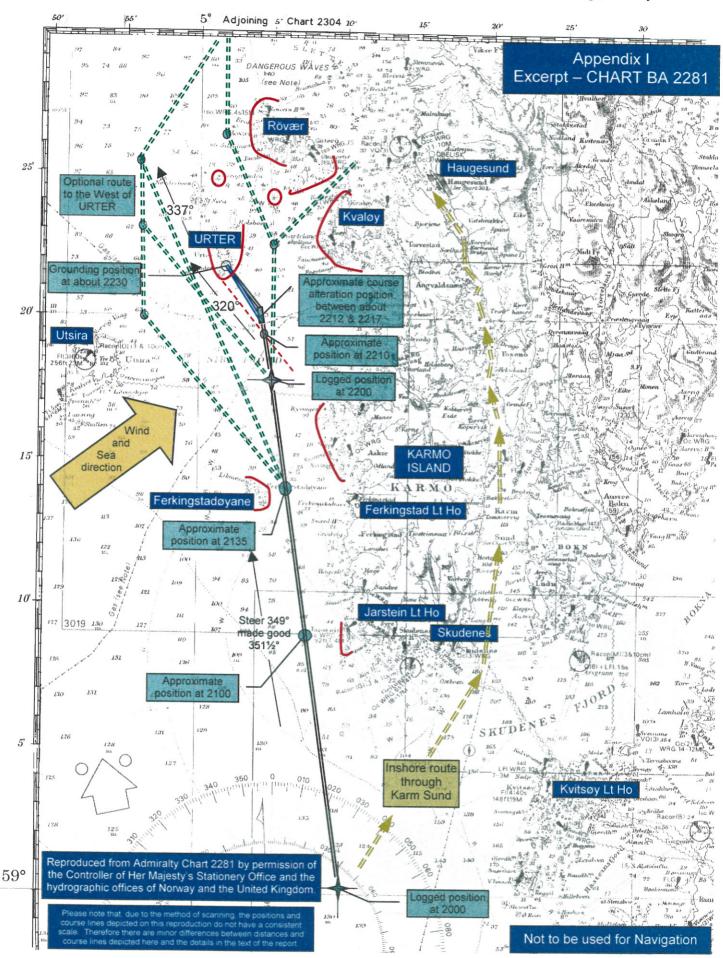
- The wind and seas were approximately South Westerly but were forecast to back to the South and East and decrease in strength during the course of the evening and night of 25 December 1999. That decrease and change in direction did not materialise.
- 5.3 The grounding was caused by the Master's inconclusive and inaccurate navigation of the vessel when steaming in waters that were well known to him. In particular:
 - 5.3.1 A written passage plan was not being kept. The Master, when on watch, did not plot on the navigational chart the positions that he observed and recorded in the Log Book.
 - 5.3.2 The Master had several navigational options available to him in the passage past the Islands of Utsire, Urter and Karmø.
 - 5.3.3 As a result of the positions not being plotted and the Master's belief in his familiarity with the area, the vessel continued on her course until about two miles from Urter Island when a course alteration was made to take the her to the South West, or windward, of Urter. This alteration was too small and made too late.
 - 5.3.4 Lack of sound navigational procedures thereafter failed to check that the course alteration had been sufficient for its purpose resulting in the vessel running aground with the main engine still at full sea speed and full pitch.
- The subsequent SAR operations swiftly ensured that all persons on board were safely evacuated by a helicopter mobilised by the Norwegian Government Rescue Services. There was no injury to any person. The vessel remained stranded on rocks on Urter Island and was declared a constructive total loss.

RECOMMENDATIONS

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- 6.1 The Master to be advised of the Conclusions of this report and of the need to correct apparent unsafe navigational practices.
- 6.2 The Managers of the vessel to be made aware of this report and be requested to review the instructions to Masters regarding safe navigational practices.



THE BAHAMAS MARITIME AUTHORITY

