

RISK WATCH

FEBRUARY 2019

FORUMS MEMBERS GET TOGETHER IN ASIA AND EUROPE

LOSS PREVENTION NEW INITIATIVES INTRODUCED

JUST CULTURE WHAT DOES IT MEAN TO YOU?

COMMUNICATION INSTRUCTIONS MUST BE CLEAR

BRITANNIA IN GREECE MEET OUR TEAM IN PIRAEUS

A MESSAGE FROM THE EDITOR

BRITANNIA'S MISSION IS TO BE **THE FINEST P&I CLUB IN THE WORLD.**



Last year was another busy year for the Club. In the previous edition we were very pleased to introduce our Copenhagen office and now our readers have the opportunity to meet the Britannia team in Greece. The office opened in October and an open house was held in December for our local Members and friends and then, more recently, following the Britannia Board meeting a cocktail party for the local shipping community was hosted by our Chairman, Nigel Palmer.

As always, we are looking at ways to increase the dialogue and communication between the Managers and our Members. One of the important ways that Members and the Club can get together is at our Member Forums that take place in European and Asia every November. A report on these can be found on the opposite page.

A recent initiative has been the Member survey which we sent out last year as part of our ongoing performance review to ensure that we continue to deliver the first-class service that our Members expect and deserve. Our CEO Andrew Cutler sent out a full report on the results which can be found on the website and I would encourage everyone to have a look if they have not yet seen it. We will be repeating the survey in 2019 and we are keen for as many Members as possible to take part in order to make sure that we can tailor our services to what our Members tell us they need.

On a personal level, as Head of Publications, I was delighted to read in the survey that 80% of those surveyed feel positively about the Club's publications and that our readers appreciate the new design and format which the whole Marketing and Publications team has worked very hard on. There is always much more work to be done and we will be carrying out a full review of all our publications in the coming months. Once again, your feedback and comments would be really useful.

We wish all readers a happy new year and a welcome to the year of the pig.


CLAIRE MYATT
Editor

BRITANNIA MEMBER FORUMS IN TOKYO AND LISBON



BRITANNIA CONTINUED THE TRADITION OF HOLDING ITS TWO ANNUAL FORUMS IN ASIA AND IN EUROPE. IN ASIA THE FORUM TOOK PLACE IN TOKYO ON 6 NOVEMBER WHERE AROUND 70 DELEGATES FROM MEMBERS THROUGHOUT THE REGION GATHERED TOGETHER AT THE IMPERIAL HOTEL. IN EUROPE AROUND 50 DELEGATES TRAVELLED TO LISBON ON 22 NOVEMBER AND STAYED IN THE HISTORIC SURROUNDINGS OF THE PESTANA PALACE, WHERE THE FORUM GALA DINNER TOOK PLACE IN THE BEAUTIFULLY RENOVATED OLD STABLES ACROSS THE ROAD FROM THE MAIN PALACE BUILDING.



As always, the Forums provide a great opportunity to bring our Members together and keep them up to date with developments in Britannia and also across the industry as a whole. There were presentations on the financial strength of the Club, recent Board decisions, claims trends and the expected impact of Brexit on the Club.

Chief Underwriting Officer, Mike Hall, announced for the third year running that there would be no P&I general increase to the advance call for the coming policy year (2019/20). In addition, Chief Financial Officer Jo Rodgers told Members about a further USD10 million capital distribution that would be shared amongst P&I mutual Members with ships on risk at midnight BST 16 October 2018. Delegates were also told that for FD&D there would be no increase to the 2019/20 advance call and that next year Members will benefit from a contribution cap of USD150,000 for any one claim.

Andrew Cutler, Chief Executive Officer of Britannia and the Managers, also updated delegates on progress with the various representative offices, focusing on Hong Kong and Singapore at the Asian Forum and on Greece and Copenhagen in Europe. In addition, there were also presentations from the People Risks, Claims and Loss Prevention Departments.

Delegates at both Forums were treated to a guest speaker this year and we were lucky to have David Baker from the International Group (IG) of P&I Clubs. David is based at the IG Secretariat in London and gave a presentation on the structure and activities of the Secretariat and described the work that it undertakes on behalf of the IG and all its members.

The Club has always encouraged delegates to ask questions during the Forums and this year that process was made easier and more interactive as we used a new app-based system. This allowed delegates to submit questions via their smart phones throughout the day which could then be displayed and answered at the end of each session.

As well as the more formal surroundings of the meeting, Members and Managers were able to socialise and continue discussions over lunch and dinner after each Forum. These were important opportunities not only for Members to meet the Managers but also for the Members to meet each other, a vital aspect of being a part of a mutual Club.



BRITANNIA LOSS PREVENTION – AN EXCITING YEAR AHEAD

THE START OF A NEW YEAR IS A TIME OF CELEBRATION AND EXPECTATIONS. A TIME TO LOOK BACK ON THE PAST YEAR AND, EVEN MORE IMPORTANTLY, TO LOOK FORWARD TO WHAT OUR MEMBERS CAN EXPECT FROM THE LOSS PREVENTION TEAM IN THE YEAR AHEAD.

During 2018 there was a change in the organisation of the Loss Prevention Department (LPD) within Britannia and three new Members of staff were recruited. The addition of Jacob Damgaard, Graham Wilson, and Ashley Boyce has increased the strength of the LPD in the fields of engineering, surveying and accident investigation, adding their own varied experience to the team's already significant maritime skills. This now gives the LPD the ability to deliver even better quality technical advice to Members on all aspects of modern ship operations.

Seminars have always been an important element of the LPD's annual programme and 2018 was no exception. In Taiwan we celebrated our 10th consecutive year of seminars showing our commitment to this country. New locations such as Copenhagen were added to the calendar which proved so successful that the team will be going back again during 2019. With the opening of our new offices in Athens and Singapore in 2018, seminars will be held here in 2019, with the first Singapore seminar on 29 January. We will keep you posted about all our seminars in our regular news bulletins and on the website.

We shall be continuing our condition survey programme to help Members identify issues that might lead to potential claims. The trend which we observed in 2018 was a welcome increase in the number of ships being rated as Good or Very Good, a trend which we expect to continue during 2019.

We have been building on the many areas of competence within the team and have been developing some new initiatives for Members during 2018 with plans to roll these out fully during 2019:

ENGINE ROOM SAFETY REVIEW – this concentrates on behaviour-based safety and consists of a 2-4 day on board review by a member of the LPD. During this time the safety

behaviour and performance of the engine room staff is observed and any shortcomings identified. The LPD team will then help Members to address these issues in order to improve their safety performance and current procedures as well as suggesting alternative measures that the Member could take to help improve their safety performance. This project will be led by Jacob Damgaard.

MARITIME RISK MANAGEMENT AND ACCIDENT

INVESTIGATIONS – this will be a review of Members' risk management and investigation processes in order to identify best practices and to point out any shortcomings. Further details of this new service are set out in the article on the next page. This project will be led by Graham Wilson.

Both these initiatives are offered as a voluntary service to our Members and as they do not target specific ship types, will be of great benefit across the membership.

VIDEOS – A new loss prevention video will be launched in 2019, based on an actual incident. This will focus on the interaction between the shore-based managers and master during an emergency and will highlight some common issues that can lead to an escalation of a situation often with catastrophic results.

POSTERS – In 2019 the LPD will introduce a brand new poster campaign. The posters will focus on safety issues which are related to real-life cases, making them more realistic with the safety message made very clear.

As the reader will see, 2019 is set to be another very exciting year for the LPD. With our wider range of services and expertise available we look forward to providing a new higher standard of assistance and we hope to see many of you at our seminars throughout the year. Happy New Year!



To contact the head of our team,
NEALE RODRIGUES, please email:
Group-BritLossPrevention@triley.co.uk



JACOB DAMGAARD: Master Mariner/Dual Maritime Officer, B.Sc. (Maritime Transport and Nautical Science). Recently Jacob was the Designated Person Ashore and Company Security officer for a fleet of Container and PCTC ships.

Previously Jacob worked as a Flag State and Port State Inspector. He has sailed as an engineer and deck officer with seagoing experience on container ships, product tankers and naval vessels.

MARITIME RISK AND ACCIDENT INVESTIGATIONS – LOSS PREVENTION SUPPORT

by Graham Wilson

AN UNDESIRABLE FEATURE OF ANY SAFETY CRITICAL OPERATION IS THAT ACCIDENTS AND CLAIMS CAN HAPPEN FROM TIME TO TIME, DESPITE THE BEST EFFORTS AND INTENTIONS OF ALL INVOLVED. HOWEVER, WHAT IS IMPORTANT IS THAT LESSONS FROM SUCH INCIDENTS ARE LEARNT IN ORDER TO TRY TO PREVENT FUTURE OCCURRENCES.

The ISM Code of course places a statutory requirement on shipping companies not only to investigate and analyse accidents but also to manage the risks to ships, personnel and the environment. However, the benefits of robust risk management and investigation processes far transcend these regulatory obligations, by offering organisations the ability to operate in a cost effective, efficient and safe manner, while achieving business objectives.

With the recent addition of Graham Wilson as a Loss Prevention Manager, the Britannia Loss Prevention Department is pleased to offer a unique service to assist Members with their maritime risk management and investigation capabilities. With its extensive operational and theoretical experience in these areas, the Loss Prevention team are able to deliver tailored specialist support to Members to:

- provide advice and guidance on the implementation of any aspects of operational risk management and investigation processes as requested by Members. This could cover topics such as the implementation of a risk management framework, evidence collection, causal analysis or a 'Just Culture'-based approach to investigations (see separate article in this edition).

- undertake desktop reviews of Members' risk management and investigation processes to benchmark these against best practice, including other transport sectors. These evaluations could range from informal 'health check' reviews to more in depth standalone reviews of procedures and processes, as agreed with the Member following an initial consultation and assessment.

- identify both best practices and any variations from the Member's own procedures or best practices.

- subject to the outcome of the review, offer constructive advice to improve the Member's performance in risk management and investigations.

Independent support and advice in areas such as maritime risk and investigations can provide assurance to Members that risks are being managed appropriately and help to prevent incidents and claims. This new and exclusive service builds on the unique capabilities of the Loss Prevention team and is offered to Members on a voluntary basis.

Please contact the Loss Prevention Team on LossPrevention@triley.co.uk for further information.



GRAHAM WILSON: Chartered Naval Architect. Graham worked as a Flag State Inspector at the UK's Marine Accident Investigation Branch (MAIB) and was Maritime Risk and Investigations Director for a major cruise ship operator. Recently Graham was a Senior Lecturer at Cranfield University, teaching the theoretical and practical aspects of marine accident investigation.

THE IMPORTANCE OF EFFECTIVE COMMUNICATION

IT MAY SEEM TO BE STATING THE OBVIOUS TO SAY THAT COMMUNICATION BETWEEN MEMBERS OF THE CREW IS VERY IMPORTANT, BUT A RECENT CASE INVESTIGATED BY THE CLUB SHOWS HOW A SIMPLE MISUNDERSTANDING CAN HAVE VERY SERIOUS CONSEQUENCES.



A chemical tanker was underway from South Africa to the east coast of the US when a storm hit. There were winds of 25 knots, seas of 2.5m, swells of 4m and significant wave heights of 4.5m. The freeboard on the bow was approximately 7m.

The following morning, the chief mate instructed the bosun to walk to the forward catwalk – but not to the bow – to see if there had been any damage during the heavy night. The bosun reported that the mooring lines on the winches had become loose and needed to be secured. The chief mate told the bosun to call the bridge to ask if the ship could slow down or alter course to make it safe to work on the bow.

The bosun called the bridge and spoke to the third mate who in turn asked the master for instructions. The master told the third mate to tell the bosun not to go forward but to wait until the afternoon and better weather. The third mate gave the order to the bosun.

The bosun then called the bridge again and told the third mate he was going forward only to tie down the mooring lines but he would not be working the winches. The third mate replied 'Okay'. This was where the communication broke down:

- What the third mate meant by 'Okay' was that the master's order had not changed and so the bosun, by going forward, was taking the risk on his own.

- However, the bosun interpreted 'Okay' to mean that he had permission to go forward and tie down the mooring lines.

The bosun then ordered two ABs to go forward to tie down the mooring lines on winches but during the operation two large waves hit the bow and knocked both ABs over. One of them sustained severe injuries to his back which have left him severely paralysed.

CONCLUSION

It is clear that there had been a breakdown in communication between the third mate and the bosun. The captain had clearly said to the third mate that the bosun was not to go forward until the afternoon and better weather. The third mate should then have clearly ordered the bosun not to go forward. Using the ambiguous word 'Okay' was not sufficient. Always make sure that any instructions are clearly communicated and understood.

'JUST CULTURE'

by Graham Wilson

THE CONCEPT OF SAFETY CULTURE AND ITS BENEFITS FOR SHIPPING COMPANIES IS WIDELY REPORTED AND WELL KNOWN. IN 2013, THE INTERNATIONAL CHAMBER OF SHIPPING¹ DEFINED SUCH A CULTURE AS BEING REPRESENTED BY THE 'VALUES AND PRACTICES THAT MANAGEMENT AND PERSONNEL SHARE TO ENSURE THAT RISKS ARE ALWAYS MINIMIZED AND MITIGATED TO THE GREATEST DEGREE POSSIBLE.' IN ESSENCE, THIS TRANSLATES TO SAFETY VALUES BEING THE CENTRAL PART OF EVERYTHING THAT A COMPANY AND ITS EMPLOYEES DO. IN PARTICULAR, THE COMMITMENT TO SAFETY AS THE HIGHEST PRIORITY SHOULD BE EMBEDDED THROUGHOUT THE ENTIRE ORGANISATION.

It is accepted that a key element of an effective Safety Culture is in fact the successful integration of a number of other 'cultures' within an organisation². These include a Reporting Culture, where concerns and incidents are able to be reported freely and openly; an Informed Culture, where the reported incident data is collected, analysed and actively disseminated; and a Learning Culture. For the latter, the company strives to learn from previous events and improve its performance by addressing the lessons.

However, fundamental to all of this is the principle of 'Just Culture'.^{3,4} This represents a shift from the previously widespread view that someone should always be held accountable in the aftermath of an accident, the so-called 'Blame Culture', which creates a 'culture of punishment'¹, with the underlying assumption that the threat of being reprimanded, or at worst, being dismissed, would motivate individuals' behaviour sufficiently to maintain safety. However, the problem with this latter approach is that the 'fear' of disciplinary action often stifles the reporting of accidents and 'near miss' incidents⁵ as well as the willingness of people to assist openly with investigations, irrespective of the likely cause. Therefore the opportunity to learn invaluable lessons and improve safety processes as a whole is diminished, if not lost.

To counter this, the term 'No-Blame Culture' is often referred to. However, in reality this is neither desirable nor feasible, as such an approach fails to account for intolerable behaviour, for example, gross negligence or a wilful violation of a procedure.

A 'Just Culture' therefore addresses these concerns by clearly defining a policy whereby employees are encouraged to report accidents or incidents without fear of retribution unless their behaviour is unacceptable; this could include acting recklessly or taking deliberate and unjustifiable risks. The policy should clearly set out the expectations for adherence to company procedures and provide a context for enforcing them. It should also recognise behaviours that exceed company expectations, as well as those that may have dipped below an acceptable level, but might not be the fault of the employee.

A key requirement is that an organisation's definition and implementation of 'Just Culture' is available and accessible by all employees. This should, in particular, define what constitutes concepts such as 'negligence', 'acceptable' and 'unacceptable' behaviour following an incident or unsafe act, and how these will be investigated and dealt with. It is also important that the principles should also be applicable to both ship and shore personnel.

¹ICS (2013), Implementing an Effective Safety Culture – Basic Advice for Shipping Companies and Seafarers, at: <http://www.ics-shipping.org/docs/default-source/resources/safety-security-and-operations/implementing-an-effective-safety-culture.pdf?sfvrsn=8>

²Reason, J (1997), Managing the Risk of Organizational Accidents, Farnham, Ashgate.

³Dekker, S (2016), Just Culture – Restoring Trust and Accountability in Your Organization, 3rd Edition, Burlington, Ashgate.

⁴UK Maritime & Coastguard Agency (MCA), Improving Safety and Organisational Performance Through A Just Culture, at: <https://www.gov.uk/government/publications/a-just-culture-improving-safety-and-organisational-performance>.

⁵IMO MSC-MEPC.7/Circ.7 – Guidance on Near-Miss Reporting, 10 October 2008.

THE COMMITMENT TO SAFETY AS THE HIGHEST PRIORITY SHOULD BE EMBEDDED THROUGHOUT THE ENTIRE ORGANISATION

Many organisations find it helpful to develop a 'decision tree'² to support their 'Just Culture' policy; this can be extremely helpful to determine the level of, or lack of, culpability following an unsafe act. Flow charts⁶ can also be created providing alternative 'decision trees', which can be adapted to suit an organisation's particular needs. Having such a process mapped is really valuable in order to ensure that all employees are aware of the procedures for determining the degree of fault and the expected follow-up actions by the company.

Effective communication of the process within the organisation is important and this should be supported by training and guidance for both ship and shoreside personnel. Ideally, a 'Champion' or 'Owner' of the 'Just Culture' process should be appointed in an organisation as the main focal point and driver of the system.

The success of the process in particular relies on an atmosphere of trust among all personnel in the organisation and therefore needs to be implemented consistently and as far as possible, transparently. Key to this is the need to try to embed changes to existing attitudes and behaviours, for example, by encouraging or possibly even rewarding the reporting of incidents and other essential safety-related information. By focussing on the positive consequences of reporting, rather than just looking to blame individuals, an effective 'Reporting Culture' can be cultivated. Clearly this requires commitment throughout an organisation, in particular from the management's commitment to safety and promotion of the 'Just Culture', as well as the active involvement of employees in the decision making and problem solving process.

An effective internal incident reporting system is also a crucial element of the process. This should be clear, open, anonymous, confidential and preferably managed with some degree of independence from other functions within the company. For example, consideration should be given to whether internal investigations will be

conducted by a single department, or by different departments with differing investigation objectives. Ideally some thought should also be given to the incident reporting forms/templates and what information is required to be provided on these. The reporting/investigation process should also be published by way of anonymised final reports with lessons learnt; this is essential to help demonstrate the value of reporting accidents and near misses to all employees.

Other stakeholders within an organisation need to be involved in the implementation of a 'Just Culture' process, such as Human Resources (HR) and the Legal department, who will both need to ensure that their and any statutory obligations are still met. For example, does the HR 'Disciplinary' process align with the overall 'Just Culture' policy? This also raises the important issue of which person(s) within an organisation will be involved in deciding culpability following any 'unsafe act', which will likely be a team consisting of representatives from departments such as Health, Safety, Quality and Environment (HSQE), Management, HR and Legal.

CONCLUSION

The journey to developing a 'Just Culture' can pose many difficult challenges for companies. However, the successful integration of this approach is considered an essential element of an effective, high performance safety critical organisation. By clearly defining the company's policy for categorising and dealing with errors and unsafe acts in a fair and just manner, the benefits of enhanced reporting and transparency can reap significant advantages in terms of safety performance and efficient operations.

⁶Hudson et al (2008), Meeting Expectations: A New Model for a Just and Fair Culture, Nice, Society of Petroleum Engineers, Ref: SPE 111977.

PORT STATE CONTROL ISSUES

by Jacob Damgaard

THE FIRST PORT STATE CONTROL (PSC) MEMORANDUM OF UNDERSTANDING (MOU) WAS SIGNED IN PARIS IN 1982 FOLLOWING THE AMOCO CADIZ DISASTER IN 1978. SINCE THAT TIME, PSC HAS BEEN RECOGNISED AS A VERY EFFICIENT WAY OF REDUCING THE NUMBER OF SUBSTANDARD SHIPS AS WELL AS IMPROVING SAFETY OF SHIPS AT SEA AND PREVENTING ENVIRONMENTAL DAMAGE.

As a detention by the PSC authorities can be a costly affair resulting in delays and potentially loss of hire, it is important that Members' ships are ready and prepared for inspection at all times. In order to assist our Members, our Loss Prevention Department (LPD) monitors detentions by the recognised authorities, including USCG, in order to identify some of the main trends and to highlight the defects that commonly cause detentions.

Fire safety continues to be one of the main defect areas – fire dampers either not closing correctly or being corroded and fire pumps leaking or malfunctioning are frequently identified as reasons for detention. For example, a mushroom fire damper may have been successfully tested but not been visually inspected. A subsequent PSC then revealed that it was partly corroded away. For emergency fire pumps, as with all pumps, it is important to make a careful visual inspection of piping and seals to check for any leaks.

A common detention issue is the emergency generator. Often this relates to it not being able to be connected to the emergency switchboard or where it cannot take on load when connected. The USCG requires that the generator is properly connected before entering US waters. Another case found that the generator's starter batteries had gone flat, which indicated that density testing of the batteries had not been carried out correctly. Members should also be aware that in some ports

the PSC officials might ask any officer to demonstrate correct operation of the emergency generator which could lead to a detention if the correct procedure is not followed.

If, during a PSC inspection, deficiencies are raised which the master finds unjustified, it is important that he makes the PSC officer aware straight away and informs his office. For certain issues, e.g. cargoworthiness, Charterers may also need to be informed. Flag state and/or the Recognised Organisation (RO) which issued the certificate to which the deficiency is connected must be contacted as soon as possible in case of detention to initiate correct rectification and release procedures.

The LPD team have also found that several detentions could have been avoided if the defect had been reported correctly. SOLAS reg. I/11C, states that if a defect occurs in a foreign port it must be reported to the local PSC authorities as well as flag state and/or RO. This is important in order to obtain the necessary approvals to operate with a defective piece of equipment.

Avoiding detentions takes a dedicated effort by both crew and the office ashore to allocate sufficient resources in order to maintain standards and provide the necessary training for the crew. It is important that adequate testing and maintenance procedures form part of the Planned Maintenance System (PMS). The crew should understand potential 'hidden' failures of equipment, such as the corrosion of a fire damper, which might not be immediately obvious.



BRITANNIA OPENS AN OFFICE IN GREECE



WE ARE VERY PLEASED TO INTRODUCE THE NEW BRITANNIA TEAM THAT IS NOW BASED IN GREECE AND HEADED UP BY DAVID HARLEY. THE OFFICE WILL BE TASKED WITH ENHANCING THE SERVICE DELIVERY FOR OUR GREEK MEMBERS AND IS BASED IN THE ICONIC IONIAN BUILDING OFF THE AKTI MIAOULI. GREECE IS AN IMPORTANT MARKET FOR BRITANNIA AND CURRENTLY ACCOUNTS FOR APPROXIMATELY 10% OF OUR MEMBERSHIP. THE ESTABLISHMENT OF AN OFFICE DEDICATED TO SERVICING THE GREEK MARKET NOW ENABLES US TO CONTINUE TO GROW IN THE AREA.

GREECE

We are very pleased to introduce the team to you:



DAVID HARLEY is a Divisional Director. After graduating, he worked for another P&I Club for four years before joining Tindall Riley more than 20 years ago. David has considerable P&I and FD&D experience, having spent time in the Korean and Taiwanese claims teams as well as heading up the Hong Kong and South East Asian claims teams. He was also responsible for the Club's Indian and Israeli Members. David recently spent nearly five years in charge of the Hong Kong office before making the move to Greece.



DENISE DELLOW is an Associate Director. After practising commercial law in New Zealand she specialised in maritime law in the UK. Denise worked for a container shipping company before joining Britannia. Denise handles P&I, CLH and FD&D cases and advises on cover issues for a range of shipping contracts and service agreements.



KONSTANTINOS SAMARITIS is an Associate Director. He is a qualified Greek lawyer and accredited mediator. He joined Tindall Riley in 2018, having previously worked for both Standard and Skuld's Greek operations for ten years. Konstantinos has also worked for a US listed shipowner and at a law firm. Konstantinos handles a wide range of P&I and FD&D claims, including major casualties.



VASILIOS KAKAMOUKAS is a Claims Manager. After graduating with a master's degree in Naval Architecture and Marine Engineering, Vasilios worked as an independent surveyor investigating P&I and H&M claims, including major casualties. He joined Tindall Riley in 2016 and handles a wide range of P&I claims.

THE OFFICE STARTED OPERATING IN OCTOBER AND ON 11 DECEMBER THERE WAS AN OPEN HOUSE WHERE AROUND 100 GUESTS FROM ACROSS THE LOCAL SHIPPING COMMUNITY CAME TO VISIT THE NEW OFFICE AND TO MEET THE LOCAL BRITANNIA TEAM AS WELL AS REPRESENTATIVES FROM OUR LONDON OFFICE. THE DAY STARTED WITH A BLESSING FROM THE PRIEST OF THE LOCAL CHURCH OF AGIOS NIKOLAOS AT PIRAEUS.



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