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WORK PROGRAMME

Revision of the Revised recommendations for entering enclosed spaces aboard ships (resolution A.1050(27))

Comments on document MSC 106/16/1

Submitted by United Kingdom, ICS, BIMCO, OCIMF, IFSMA, INTERTANKO, CLIA, INTERCARGO, IMarEST, InterManager, ITF, NI and WISTA

SUMMARY

Executive summary:	This document provides comment on the submission by China, proposing a new output for the organization to undertake revisions to resolution A.1050(27), highlighting additional information that should be considered and provides high level information gathered on matters relating to enclosed space incidents.
Strategic direction, if applicable:	Other work
Output:	Not applicable
Action to be taken:	Paragraph 15
Related documents:	MSC 106/16/1; resolution A.1050(27); CCC 8/8, CCC 8/8/2; CCC 6/5/6; MSC 101/21/11; resolution MSC.350(92); MSC.1/Circ.1401 and III 8/4/5

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC- MEPC.1/Circ.5/Rev.3) and comments on document MSC 106/16/1 by China.

Background

2 The co-sponsors support the new output proposed by China in document MSC 106/16/1 to undertake a revision of the *Revised recommendations for entering enclosed spaces aboard ships* (resolution A.1050(27)). Much information has been gathered by the Organization within GISIS, through comprehensive accident reports and lessons learned from marine casualties, which is pertinent to the assessment and review of the effectiveness

of the current Assembly resolution. This is particularly the case with human behaviour and human element associated with accidents within enclosed spaces that can now be used to assist in delivering comprehensive recommendations which are current and based upon the fact that incidents have continued to occur since resolution A.1050(27) was adopted.

3 With a new resolution in place, it is hoped that incident numbers will decline. However, in order to process a fresh set of recommendations, those Sub-Committees with the required competence to discuss and deliver these aspects will need to be fully engaged. In this respect, the co-sponsors consider that the scope of the revision needs to be broad and comprehensive in order to take into account both the human element and ship design factors that have contributed to previous enclosed space incidents. This would undoubtedly mitigate against, and hopefully prevent, such incidents occurring in the future.

4 It is noted that the current Recommendations are a revision of resolution A.864(20) which was adopted at the twentieth session of the Assembly in 1997, 25 years ago. The purpose of that and the revised recommendations was to reduce the risk and hazards of enclosed spaces and to therefore negate harm to seafarers and shore contracted personnel working on board ships. Unsurprisingly, the number of lives saved by resolution A.1050(27) will never be known.

5 However, the co-sponsors wish to highlight the fact that, since the current revision of these recommendations was adopted on 30 November 2011, several further amendments to SOLAS and MSC circulars have been adopted by the Organization that are pertinent to enclosed space entry and should be included in the proposed revision. These amendments cover aspects such as: emergency drills for enclosed spaces; the carriage of gas detection equipment on board ships; and MSC.1/Circ.1401 dealing with vessels inerted with nitrogen plus the associated risks and hazards. These SOLAS amendments and circulars need to be considered when undertaking the proposed new output. For ease of reference, they are summarized below.

6 SOLAS regulation III/19.3.6, enclosed space entry and rescue drills refer, viz:

.1 "3.6.1 Enclosed space entry and rescue drills should be planned and conducted in a safe manner, taking into account, as appropriate, the guidance provided in the recommendations developed by the Organization*.

* Refer to the *Revised recommendations for entering enclosed spaces aboard ships* (resolution A.1050(27))."

.2 SOLAS chapter XI-1 regulation 7 (Atmosphere testing instrument for enclosed spaces) is also relevant:

"Every ship to which chapter I applies shall carry an appropriate portable atmosphere testing instrument or instruments. As a minimum, these shall be capable of measuring concentrations of oxygen, flammable gases or vapours, hydrogen sulphide and carbon monoxide prior to entry into enclosed spaces. Instruments carried under other requirements may satisfy this regulation. Suitable means shall be provided for the calibration of all such instruments."

7 Contained within the *Guidelines on tank entry for tankers using nitrogen as an inerting medium* (MSC.1/Circ.1401), some highly relevant details relating to the specific risks and hazards for entry into tanks when nitrogen is used are given. Much of this information is of use to other types of ship when making a tank or hold entry but may be overlooked due to the

specific title of the circular and the gas involved. Such references could be of particular use in the revision of the current Assembly resolution, in addition to the information contained within the circular. The many lessons learned from the industry appertaining to these types of ships could also be suitably incorporated to the betterment of all.

8 Likewise, in recent years there have been several submissions to IMO sub-committees relating to the need for changes to resolution A.1050(27) or to the provision of statistical information supporting that need. In many of these submissions, comments were made on the human element aspects of incidents, hold atmospheric gas monitoring, and also the contribution of the design or construction of the ships involved in the incident.

9 In document CCC 6/5/6 (United Kingdom and IBTA) and the supporting document CCC 6/INF.7 (United Kingdom), the dangers and resulting accidents which involve enclosed spaces and hold access are chronicled. In particular, hold access ladders, such as the enclosed trunk ladder (occasionally referred to as the 'Australian Ladder') is singled out as an area where a considerable number of enclosed space incidents have occurred. This highlights a need to consider design of access as a means of reducing the number of such incidents. The submissions also feature many incidents relating to cargo hold gas monitoring, an appreciation of oxygen depleting cargos, cargos which are fumigated and cargos which emit toxic gas. Likewise, the submissions discuss the repetitive systemic nature of the enclosed space incidents which can only be addressed by education and training together with leadership and enhanced emphasis on the need for a consistent safety culture.

10 Document III 8/4/5 (China) also highlights the dangers of access to cargo and other spaces and the accumulation of toxic gas or depleted oxygen levels leading to their influence in some enclosed space incidents. Further, in the report of the Working Group (III 8/WP.3), referring to China's submission above, the Group noted the ongoing review of the *Revised recommendations for entering enclosed spaces aboard ships* (resolution A.1050(27)) under existing output 6.15 of the CCC Sub-Committee, and agreed to recommend that the III Sub-Committee request the CCC Sub-Committee to consider the contents of their document during the ongoing revision of resolution A.1050(27).

11 Prior to CCC 6 (2019), and subsequently, many organizations of the maritime industry have been involved in systematic assessment of enclosed space hazards using an adaptation of the internationally recognized "Hierarchy of Hazards". These reviews have resulted in the emergence of several distinct themes focusing on: design and construction, gas evolution, movement and entrapment within the ship structure, and the human element prevalent in many enclosed space incidents, such as the rush to rescue a single casualty resulting in the death of many, the disregard of procedures and local adaptation of unsafe practices. Likewise, it has been identified that in many cases ship and shore personnel are subject to time pressures which may result in them rushing or missing checks to meet artificial deadlines which often result in entry into spaces for which they are not fully prepared. These aspects have resulted in countless casualties where a known breach of procedure, (just a 'quick look inside!') in an enclosed space, has often ended in further loss of life. The results of this research will be submitted to the appropriate body within the Organization once a decision on the output proposed in document MSC 106/16/1 has been made.

12 It is hoped that these and other relevant submissions will be included in the proposed review of the current resolution A.1050(27), as well as the comprehensive information held within GISIS. Naturally these submissions should be included in any future review of the current resolution relating to enclosed spaces.

13 In recent months, the co-sponsor's extensive and further research has shown that between the adoption of resolution A.1050(27) and 31 August 2022, there have been a further recorded 108 fatal accidents within enclosed spaces on board ships, resulting in the needless loss of life of 122 seafarers and 45 shore personnel working on board. In order to reduce, indeed halt, such needless loss of life within the complexities and risks of the maritime world, the review of resolution A.1050(27) needs to be comprehensive, in depth and as wide-ranging as possible in order to encapsulate the breadth of such studies. A new resolution on the recommendations for entry into enclosed spaces would go a long way towards avoiding the unnecessary deaths of seafarers and shore-workers.

Proposal

14 The co-sponsors propose that:

.1 the scope of work for the proposed review be expanded to encompass the lessons learned from the recorded information of enclosed space incidents available to the Organization and to the industry;

.2 to adequately undertake this task, it will be necessary to engage, where appropriate, additional IMO Sub-Committees such as the HTW Sub-Committee, to allow the human element to be fully considered and the SDC and SSE Sub-Committees for design and construction improvements;

.3 taking into account the many complexities involved in the carriage of maritime cargoes, including innovative fuels, consider whether the recommendations provided should remain integrated or split up into those of general enclosed spaces or specific ship type/fuel type risk and hazards, with specific mitigation measures; and

.4 the scope of work be expanded to undertake a comprehensive revision of resolution A.1050(27), revising recommendations for entering enclosed spaces aboard ships. This would incorporate information (as appropriate) from industry studies on enclosed space incidents and the Organization's related circulars, the extraction of appropriate information contained within SOLAS, and applying best practice from the industry.

Action requested of Committee

15 The Committee is invited to:

.1 note the above points made by the co-sponsors in this proposal; and

.2 consider the proposal made in paragraph 14 when establishing a new output, specifically a broadening of the scope of work and placement on the agenda of the appropriate Sub-Committees.