



Concentrated Inspection Campaign (CIC) on Enclosed Space Entry Drills

Introduction

The Maritime Administrations of the Paris and the Tokyo Memoranda of Understanding (MoU) on Port State Control have announced that they will launch a joint Concentrated Inspection Campaign (CIC) to be held for three months, commencing from 1 September 2015 and ending on 30 November 2015, with the purpose of ensuring that effective procedures and measures are in place to safeguard seafarers on-board ships when entering and working in enclosed spaces, and to check compliance with the applicable requirements of the SOLAS Convention.

Details of CIC

It is anticipated that the Paris and Tokyo MoUs will carry out around 10,000 inspections during the CIC.

The ship's procedures and measures that are in place with respect to enclosed spaces will be checked in detail for compliance with the requirements of SOLAS during a regular Port State Control inspection, conducted under the new inspection regime (NIR) within the Tokyo and Paris MoU regions.

Port State Control Officers (PSCOs) will use a list of ten selected questions to establish that crew members with enclosed space duties are familiar with relevant equipment and have received training to carry out their duties and identify and understand the hazards associated with entry into enclosed spaces. Additionally there are questions aimed at gathering information about the existence of measures in place to test the atmosphere of an enclosed space to confirm it is safe to enter and remains safe whilst persons are within the space.



*Planning Enclosed Space Entry
(by kind permission of IMCS – Group, Antwerp)*

If deficiencies are found, actions by the Port State may vary from recording a deficiency and instructing the Master to rectify it within a certain period of time, to detaining the ship until serious deficiencies have been rectified. In the case of detention, publication in the monthly detention lists of the Tokyo and Paris MoU websites will take place. PSCOs will apply a questionnaire listing a number of items to be covered during the CIC. The contents and applicable references have been included within this Risk Alert.

The Managers also understand that the Authorities of at least the Indian Ocean, Black Sea and Riyadh MoU's on Port State Control will conduct similar and simultaneous CIC's. Given the importance of the topic, there is the probability of other MOUs implementing similar CICs.

Club Advice

Since the introduction on 1 January 2015 of SOLAS Regulation 19, mandatory entry and rescue drills have been required every two months. All crew members who have responsibilities for entry into and rescue from enclosed spaces have to participate in these drills. Detailed guidance is contained in recommendations for enclosed space entry from IMO Resolution A.1050(27).

Drills shall include the following:

1. Checks and use of PPE (Personal Protective Equipment).
2. Checks and use of communications equipment and procedure.
3. Checks and use of atmosphere measuring devices.
4. Checks and use of rescue equipment.
5. Instruction on first aid and resuscitation.

The intention of SOLAS Chapter III/Regulation 19 is to ensure that all relevant personnel have the necessary awareness of the risks, and are properly trained to follow all procedures to ensure that any necessary enclosed space entry will be done in as safe a manner as possible.

The Inspection

PSCOs of participating MOU's will use the list of ten selected questions set out below to establish that crew members with enclosed space duties are familiar with relevant equipment and have received training to carry out their duties and identify and understand the hazards associated with entry into enclosed spaces.



The ten questions:

1. Are there measures in place to test the atmosphere of an enclosed space to confirm it is safe to enter?
2. Are crew members responsible for testing the atmosphere in enclosed spaces and trained in the use of the equipment referred to in Question 1?
3. Are the crew members familiar with the arrangements of the ship, as well as the location and operation of any on-board safety systems or appliances that they may be called upon to use for enclosed space entry?
4. Are crew members responsible for enclosed space emergency duties, familiar with those duties?
5. Is the training manual available on-board and its' contents complete and customised to the ship?
6. Is there evidence on-board that enclosed space entry and rescue drills are conducted in accordance with SOLAS Chapter III, Regulation 19?
7. Have the ship's crew participated in an enclosed space entry and rescue drill on-board the ship at least once every two months in accordance with SOLAS Chapter III, Regulation 19.3.3?
8. Are crew members responsible for enclosed space entry aware of the associated risks?
9. During the CIC, did the PSCOs observe an enclosed space entry and rescue drill?
10. Did the drill comply with the requirements of SOLAS Chapter III, Regulation 19.3.6?

Non-compliance

Quite apart from the risk of detention and the adverse operational, commercial and reputational consequences that may flow from that, non-compliance or inadequate record keeping, is a significant potential danger to the vessel itself and all on-board. Attention is also drawn to the Club's Risk Alert on Dangerous Spaces (RA19) which can be found at the following link:

<http://www.steamshipmutual.com/Risk-Alerts/RA19DangerousSpaces.pdf>

Our grateful thanks are extended to the Paris MOU for their assistance in providing information published in this Risk Alert.

Website; <https://www.parismou.org/launch-joint-concentrated-inspection-campaign-crew-familiarization-enclosed-space-entry>

For further information on this or other Loss Prevention topics please contact the Loss Prevention Department, Steamship Insurance Management Services Ltd.

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