10 August 2015

Marine Advisory: 05/2015

SUBJECT: CONCENTRATED INSPECTION CAMPAIGN - CREW FAMILIARIZATION FOR ENCLOSED SPACE ENTRY

References: (1) SOLAS Regulation III/19.3.6 as amended by Resolution MSC 350(92)
(2) Resolution A.1050 (27)
(3) Marine Notice SAF-003

Dear Shipowner/Operator/Master:

The Paris MOU and Tokyo MOUs will conduct a Joint Concentrated Inspection Campaign (CIC) on Crew Familiarization for Enclosed Space Entry. The inspection campaign will be conducted between 1 September and 30 November 2015.

Reference (1) requires enclosed space entry and rescue drills (copied below). This requirement entered into force on 1 January 2015.

SOLAS III/19.3.6 Enclosed space entry and rescue drills

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.*

3.6.2 Each enclosed space entry and rescue drill shall include:
   .1 checking and use of personal protective equipment required for entry;
   .2 checking and use of communication equipment and procedures;
   .3 checking and use of instruments for measuring the atmosphere in enclosed spaces;
   .4 checking and use of rescue equipment and procedures; and
   .5 instructions in first aid and resuscitation techniques.

* Refer to the Revised Recommendations for entering enclosed spaces aboard ships, adopted by the Organization by resolution A.1050 (27)”

This Administration recently investigated two enclosed space casualties which occurred on Liberian flag vessels. These casualty investigations support the need for the confined space entry training and exercises required by reference (1), and Marine Notice SAF-003, reference (3) above, provides guidance on entering enclosed spaces and enclosed space entry and rescue drills.

Guidance:

As defined in reference (2) and required by reference (3), all companies are reminded that they shall:

1. Establish a safety strategy to prevent accidents upon entry into enclosed spaces.
2. Conduct a risk assessment concerning the entry of all enclosed spaces on board the
3. Establish enclosed space entry procedures which are to be included among the key shipboard operations concerning the safety of personnel and the ship in accordance with paragraph 7 of the International Safety and Management Code which:
   - Will not allow any person to open or enter an enclosed space unless authorized by the Master or nominated person, and only when appropriate safety procedures laid down for the particular ship are followed, and
   - Makes available the appropriate safety equipment for personnel.

4. Provide training in the use of atmospheric testing equipment (Gas Meters) in such spaces and a schedule of regular onboard drills for crews.

The ship’s procedures and measures for enclosed space entry will be checked in detail for compliance with the requirements of SOLAS during a regular Port State Control inspection.

Port State Control Officers (PSCOs) will use the attached list of 10 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.

Please see the attached PSC check list with additional guidance in blue.

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. Note failure to be able to properly respond and indicate compliance with questions 3 to 9 may result in a PSC detention.

If you have any questions please call +1-703-790-3434 and ask for the Safety Department, or send an email to safety@liscr.com.

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# CIC on Crew Familiarization for Enclosed Space Entry

This CIC applies to *all* ships.

**Inspection Authority:**

**Ship Name:**

**IMO Number:**

**Date of Inspection:**

**Inspection Port:**

<table>
<thead>
<tr>
<th>No.</th>
<th>Item</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
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<tbody>
<tr>
<td>Q1</td>
<td>Are there measures in place to test the atmosphere of an enclosed space to confirm it is safe to enter? A copy of the procedure should be available in the SMS (ISM Code part A/8 Emergency Preparedness) and made available to the PSC inspector.</td>
<td>☐</td>
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<td>Q2</td>
<td>Are crew members responsible for testing the atmosphere in enclosed spaces trained in the use of the equipment referred to in Question 1? The record of training should be found in the responsible seafarers on board training record.</td>
<td>☐</td>
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<td>Q3</td>
<td>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? This should be done as part of the initial familiarization procedures following ISM Code/part A/ 6.3 Resources and Personnel.</td>
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<tr>
<td>Q4</td>
<td>Are crew members responsible for enclosed space emergency duties, familiar with those duties? This should be done following ISM Code/part A/ 8 Emergency Procedures</td>
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<tr>
<td>Q5</td>
<td>Is the training manual available on board and its contents complete and customized to the ship? While not specifically required, this information should be incorporated in the SOLAS Training Manual and the on board training aids required by SOLAS III/35.</td>
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<td>Q6</td>
<td>Is there evidence on board that enclosed space entry and rescue drills are conducted in accordance with SOLAS Chapter III, Regulation 19? This should be logged in the Official Log Book (see Liberian Maritime Regulation 10.296(e) for other emergency drills).</td>
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<tr>
<td>Q7</td>
<td>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? The participation of the crew members with enclosed space entry or rescue responsibilities should be recorded in the appropriate log book.</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Q8</td>
<td>Are crew members responsible for enclosed space entry aware of the associated risks? This should be addressed in accordance with ISM Code/part A/ 1.2.2 Objectives and ISM Code/part A/ 6.3 Resources and Personnel.</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Q9</td>
<td>During the CIC, the PSCO is to observe an enclosed space entry and rescue drill. Did the drill comply with the requirements of SOLAS Chapter III, Regulation 19.3.6?</td>
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<tr>
<td>Q10</td>
<td>Is the ship detained as a result of a “NO” answer to any of the questions?</td>
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**Note 1** For PMoU, questions 1 & 2 are for information purposes only.

**Note 2** Each question should be answered and only one box ticked for that question.

**Note 3** Questions with an asterisk indicate Code 30 (vessel may be detained) may be issued.

The CIC on Crew Familiarization for Enclosed Space Entry was conducted during the period September – November 2015.