THE REPUBLIC OF LIBERIA
LIBERIA MARITIME AUTHORITY

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Marine Advisory: 23/2026

SUBJECT: Enclosed Space Entry Procedures and Risk Assessments

References

a) IMO Resolution MSC.581(110), Revised Recommendations for Entering Enclosed Spaces Aboard Ships;
b) SOLAS Chapter III, regulation 19.3.6;
c) SOLAS Chapter XI-1, regulation 7;
d) International Safety Management (ISM) Code, sections 7, 8 and 10;
e) Marine Notice SAF-003, Procedures for Entering Enclosed Spaces and Enclosed Space Entry and Rescue Drills;
f) Marine Advisory 28/2024/Rev.1, Entry into Enclosed Space Incidents.

Dear Shipowners, Operators, Ship Managers, Designated Persons Ashore (DPAs), Masters, and Other Maritime Stakeholders:

Purpose

The purpose of this Marine Advisory is to emphasize the need to implement the ship-specific enclosed space entry procedures in accordance with Marine Notice SAF-003, reference (e), taking into account the Revised Recommendations adopted by IMO Resolution MSC.581(110), reference (a).

The Administration has noted deficiencies raised by Port State Control involving enclosed space entry procedures that had not been updated in accordance with reference (a), together with risk assessments that did not adequately identify and address the atmospheric hazards associated with enclosed spaces, including the potential presence of carbon dioxide (CO_2). Companies should ensure that the ship-specific risk assessment undertaken by a competent person adequately identifies the hazards associated with enclosed spaces and provides the basis for the vessel's Enclosed Space Register, emergency response plan, entry procedures and selection of appropriate atmosphere-testing equipment.

Risk Assessment and Ship-Specific Implementation

Resolution MSC.581(110) provides a ship-specific approach to the identification and management of enclosed spaces. The Company should ensure that a ship-specific risk assessment is conducted by a competent person to identify the enclosed spaces on board, including connected and adjacent spaces, the hazards associated with those spaces, the risks under the differing conditions likely to arise, and the mitigation measures required before entry. The identified spaces and relevant information should be recorded in the ship-specific Enclosed Space Register, which should be maintained on board and ashore, in accordance with references (a) and (e).

The risk assessment and Enclosed Space Register should form the basis for the development of the ship-specific enclosed space emergency response plan and for determining the ventilation, atmosphere

testing, entry, rescue and other control measures applicable to each space. The assessment should also identify the gas-detection equipment necessary for the ship's operational and cargo profile. The risk assessment should be considered dynamic and should remain valid for the actual conditions on board. A ship-specific baseline assessment and Enclosed Space Register should be maintained; however, the assessment should be reviewed and, where necessary, updated when the hazards or conditions change, including changes relating to:

- the cargo currently carried or previously carried;
- the contents or use of the space;
- connected or adjacent spaces;
- the intended entry or work activity;
- the ship's configuration or operations; and
- other prevailing operational conditions.

A completely new baseline risk assessment need not necessarily be prepared for every voyage where the relevant hazards and conditions remain unchanged. However, an entry-specific assessment should be conducted before each enclosed space entry to confirm that the baseline assessment remains valid and that the controls are appropriate for the conditions existing at the time of entry.

Cargo-Related Hazards and Gas-Detection Equipment

The competent person's assessment should take account of the characteristics of the cargo currently carried and previously carried, together with relevant cargo information and Safety Data Sheets, ventilation arrangements, coatings, cargo residues and other factors that may affect the atmosphere within the space.

Gas-detection equipment should be appropriate for the cargo that the ship has carried and is carrying and for the gases identified by the risk assessment. Companies should therefore review whether changes in the vessel's cargo or hazard profile affect the gases to be measured, the type and number of instruments required, or the entry and control measures to be applied. Where the assessment identifies the potential presence of CO_2, suitable equipment capable of measuring CO_2 should be provided and used in accordance with references (a) and (e).

Administration Guidance

The Administration recommends that Companies:

1. Review their Safety Management Systems and ensure that the requirements and guidance contained in Marine Notice SAF-003, reference (e), and Resolution MSC.581(110), reference (a), are effectively implemented on board each ship.
2. Ensure that a ship-specific baseline risk assessment has been conducted by a competent person, identifying the enclosed spaces, connected and adjacent spaces, reasonably foreseeable hazards, differing conditions likely to arise, and the required risk mitigation measures.
3. Establish and maintain an up-to-date ship-specific Enclosed Space Register based on the competent person's risk assessment.
4. Use the risk assessment and Enclosed Space Register as the basis for the ship-specific enclosed space emergency response plan and for determining the necessary entry, testing, ventilation, rescue, and other control measures.
5. Ensure that a competent person conducts an entry-specific risk assessment before each enclosed space entry, taking account of the actual conditions, the intended work and the cargo-related and other hazards present at the time of entry.
6. Review and, where necessary, update the baseline risk assessment and Enclosed Space Register when the cargo or hazard profile, use or contents of the space, ship configuration, operations or other relevant conditions change.

7. Ensure that atmosphere-testing equipment is appropriate for the cargo the ship has carried and is carrying and for all gases identified in the risk assessment, including CO_2 where applicable.
8. Ensure that competent and responsible persons, attendants, persons entering enclosed spaces, and rescue personnel receive appropriate training and are familiar with their duties under the ship's procedures.

For questions regarding this Marine Advisory, please contact this Administration at email: RegsAndStandards@liscr.com or via telephone number +1 703 7903434.

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