

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
10th session
Agenda item 8

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**REVISION OF THE REVISED RECOMMENDATIONS FOR ENTERING ENCLOSED
SPACES ABOARD SHIPS (RESOLUTION A.1050(27))**

Comments on the report of the Correspondence Group

Submitted by IACS

SUMMARY

Executive summary: This document contains comments on the report of the Correspondence Group on the Revision of Resolution A.1050(27).

*Strategic direction,
if applicable:* 6

Output: 6.15

Action to be taken: Paragraph 24

Related document: CCC 10/8

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.5) and provides comments on the report of the Correspondence Group on Revision of Resolution A.1050(27).

Background

2 CCC 9 established the Correspondence Group to progress consideration of this agenda item. IACS is grateful to the Coordinator and the participants in the Group for their constructive approach and notes that, whilst having made good progress, the Group did not reach agreement on a few paragraphs/sections in the draft Revised Recommendations (CCC 10/8, paragraph 25), proposing to address those in a working group at CCC 10 (CCC 10/8, paragraphs 26 and 27.3).

Discussion

3 Having participated in the Correspondence Group and carefully reviewed the draft Revised Recommendations, IACS has the following comments on the draft text contained in annex 1 to the report.

Paragraph 1.1

4 This paragraph is considered unnecessary as this is a repetition of the paragraph above it, and of the definition given in paragraph 2.1.

Paragraph 2.1.4

5 IACS does not support including paragraph 2.1.4 as part of the definition of an "Enclosed space". The wording "potential to contain a hazardous atmosphere" is ambiguous and such a "potential" will depend on a lot of varied factors and perceptions, including legal interpretations. In contrast, the current definition is clear, straightforward, and easy to understand. Many governmental agencies, such as OSHA in the United States, use the same definition as given in the existing version of the resolution. Also, IACS is concerned that given the approach, the list of spaces to include will keep growing, even though the phrase "includes but not limited to" is present.

Paragraph 2.5

6 IACS supports the removal of the additional shaded sentence "who has received adequate training along with sufficient theoretical knowledge and practical experience" (shown as deleted). The words "adequate" and "sufficient" are subjective, as well as the term "practical experience".

Paragraph 3.1

7 The phrase "[, such as in case a ship stores treated ballast water or grey water temporarily in its ballast water tanks,] or the contents of connected spaces or adjacent spaces, including cargo, fumigants, fuel oils, slops, oxygen depleting conditions and the physical or structural arrangement of the space" in the last part of the paragraph is considered unnecessary. IACS finds little value in a long list of examples, which are not comprehensive.

Paragraph 3.6.1

8 The phrase "...The competent person should have received adequate training along with sufficient theoretical knowledge and practical experience..." is subjective and not considered necessary. The definition of competent person should be consistent with that in paragraph 2.5.

Paragraph 3.9

IACS does not agree with the inclusion of this paragraph in its entirety, as a qualified internal or external auditor going aboard a ship knows that all applicable requirements must be checked and verified. This need not be stated in each and every regulation or resolution. Therefore, it is proposed to delete the entire paragraph, as it is an implied audit requirement and does not add value by mentioning it in this document explicitly.

Paragraphs 4.1, 4.2, 4.3

9 IACS finds that there is repetition in the subsections with the content repeated in other sections. The entire section 4 would benefit from restructuring.

Paragraph 4.5.3

10 IACS does not support the inclusion of the word "potential", as a potential risk will be ever-present. The risk needs to be positively identified.

Paragraph 5.2

11 IACS does not support the inclusion of the words "opening of". It may not be possible to do the atmosphere testing (which is a prerequisite for issuance of permit) without "opening" the enclosed space.

Paragraph 6.2.1: inclusion of the text as proposed

12 IACS does not support the inclusion of this paragraph, as conducting a joint risk assessment with a terminal representative, who has "responsibility for operations", is not practical to follow and will have legal consequences, if not implemented thoroughly. Paragraph 6.2.2 is considered adequate for this purpose.

Paragraph 6.5

13 IACS supports the proposed changes to paragraph 6.5.

Paragraph 6.7: inclusion of the proposed five sub-paragraphs

14 IACS does not support prescribing minimum training requirements. Such training requirements should be part of the STCW Convention. Unless standards of such training and criteria for experience are established, the value of adding this sentence is questionable. SOLAS does not include these aspects to be covered during training drills. STCW does not cover training mentioned in this paragraph for all ranks of seafarers on board all types of ships, thereby severely restricting the number of crew that can satisfy these training requirements on a ship.

Paragraph 7.6

15 IACS supports the proposed changes in paragraph 7.6.

Paragraph 8.2

16 IACS does not support the inclusion of the wording "at regular intervals", which is arbitrary, and proposes to replace it with "before entry".

Paragraph 8.4

17 IACS finds the proposed paragraph and inclusions to be too prescriptive. The list of examples does not cover all issues and may lead to wrong conclusions and interpretations, e.g. how much increase or decrease in ambient temperature warrants additional testing. IACS believes that paragraph 8.3 covers the most important aspect and need not be repeated in paragraph 8.4.

Paragraph 9.3

18 IACS does not support the inclusion of the new paragraph as it is a repetition of the provision stated in paragraph 6.4.6.

Paragraph 10.4.2

19 IACS supports the proposed paragraph 10.4.2.

Appendix 1, section 1

20 IACS does not support the proposed question "Has rescue equipment, e.g. hoist, winch and tripod, been ready to be deployed?" and proposes replacing it with the question "Is the rescue equipment as identified appropriate for the space being entered ready for deployment?".

Appendix 1, section 5, note 1

21 IACS does not support the last sentence "If persons exit the space and leave it unattended this voids the Permit, and a re-inspection is required", as it finds the provision to be too restrictive. If a person leaves the space for some time, during which there is no change to conditions on the basis of which the permit was granted, there is no need for re-inspection.

Appendix 3, example of an enclosed space register

22 IACS opines that there should be no need to provide a template/example as long as the guidance provided in sections 3 and 4 of the resolution is complied with.

Proposal

23 IACS would appreciate the consideration of the above points in the working group, should one be established.

Action requested of the Sub-Committee

24 The Sub-Committee is invited to consider the foregoing, the proposal in paragraph 23 and take action, as appropriate.
