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Subject: China MSA launches a nine-month inspection campaign on ships' enclosed spaces

Entering ship's enclosed spaces poses risks of asphyxiation, poisoning, fire and explosion, as well as risk of work-related injuries. The inspection campaign on ships' enclosed spaces will be from 15 January 2025 to 14 October 2025. A summary of the campaign is given below to assist our clients to be compliant and to avoid possible problems.

The definition and typical locations of ship's enclosed spaces

Ship's enclosed spaces refer to the spaces that meet any of the following conditions:

1. Restricted entry or exit;
2. Insufficient ventilation;
3. Not designed for continuous human occupancy.

Ship's typical enclosed spaces include but not limited to the following places: cargo hold, double bottom tank, fuel tank, ballast tank, cargo pump room, cargo compressor room, empty isolation compartment, chain locker, empty compartment, box keel, protective interlayer space, boiler, engine crank box, engine scavenging box, sewage tank, and adjacent unventilated space not used for the storage of cargo but which may have the same air environment characteristics as the ship's enclosed spaces.

Key points of MSA's inspection

1. Are crew members responsible for enclosed spaces entry aware of the associated risks?
2. Are measures in place to control visitors' and crew members' entering into enclosed spaces?
3. Is there a complete list of enclosed spaces?
4. Are the enclosed spaces marked and for authorized personnel only?
5. Are the atmosphere testing devices regularly checked and calibrated?
6. Are the emergency rescue equipment for enclosed spaces entry in good condition?
7. Are the personnel familiar with the safe entry and risk assessment procedures for

- enclosed spaces?
8. Are the personnel familiar with the operation of safety protective equipment and devices?
 9. Is the enclosed spaces entry and rescue drill in accordance with SOLAS Chapter III, Regulation 19.3.3?
 10. Is the SMS related to enclosed spaces operations effectively implemented on board?

Focus of the MSA's inspection

➤ Documentation and records check

Ship's enclosed spaces should be regularly identified and assessed, and a corresponding list should be established. Ships are required to develop emergency rescue plans for operations in enclosed spaces, safety procedures for entering enclosed spaces, and emergency response procedures for evacuation and accident rescue.

Before entering an enclosed space, records of risk assessment, entry permits, authorization from the master or designated person in charge, adequate ventilation, and air testing using calibrated gas detection equipment must be maintained. Competent personnel should receive safety training for enclosed spaces operations.

Crew members responsible for rescue and first aid should keep a record of regular training, and ships engaged in international navigation should maintain records of enclosed spaces entry and rescue drills.

➤ Ship structure and equipment inspection

The mechanical and natural ventilation equipment of the enclosed space ventilation system must be in good condition. Entrance doors, manholes, passages etc. in the enclosed spaces shall maintain structural integrity and can be well sealed.

Internal facilities in the enclosed spaces inclusive of ladders, lighting, and water level detectors should be in good condition. Gas detection and monitoring equipment must be in good order with an accompanying operation manual. The fixed gas monitoring system should also be in normal condition.

Emergency rescue and protective equipment, such as personal protective equipment, communication devices, and rescue equipment, must all be in good condition.

➤ Crew member's competency and practical operations check.

Crew members should be familiar with the locations of ship's enclosed spaces and can fully evaluate the potential risks as well as being familiar with the safety procedures of entering into enclosed spaces.

Crew members responsible for gas detection should be proficient in operating detection instruments. Responsible crew members should be familiar with the operation of safety

protection equipment and training. Crew members responsible for rescue and first aid should fully understand the corresponding procedures. Entry and rescue drills for enclosed spaces must comply with the requirements of conventions, regulations, and standards.

Suggestions

1. Shipowners and/or managers shall establish safety management systems for entering enclosed spaces, improve emergency plans, conduct relevant training, and strengthen their supervision and inspection. Collect cargo information to confirm whether the ship is carrying dangerous cargo that may produce toxic or flammable gases, or non-dangerous goods that may cause the risk of oxygen deficiency. Ascertain whether the ship has operations involving entry into enclosed spaces, such as tank cleaning or gas freeing operations.
2. Ships shall effectively manage and control visitors boarding the ship, such as conducting registration and information verification in advance. Strengthening the inspection and maintenance of the ship's hull structure, re-identify ship's enclosed spaces and mark them clearly. Promptly eliminate any corrosion for damage to cargo hold bulkheads and other parts of the ship. Conduct targeted emergency drills and exercises to enhance emergency operation skills. Ships are also suggested to conduct self-check based on the attached checklist.
3. Crew members shall strictly follow the operational standards. Before entering an enclosed space, ensure adequate ventilation is carried out. Conduct oxygen level testing and measurement of harmful gas content in a standardized manner. Properly wear the relevant equipment, use safety belts (ropes) as required, and arrange other crew member to monitor the whole operation.

We hope the above will be of assistance. If there is any query, please feel free to contact us at oasis@oasispandi.com at any time.

Best regards,

Oasis P&I Services Company Limited

Attachment: Checklist for enclosed space entry

Attachment

违规进入船舶危险密闭空间行为专项检查清单 CHECK LIST FOR ENCLOSED SPACE ENTRY

船名 SHIP NAME		船型 TYPE		检查日期 DATE	
No.	项目 ITEM	是 YES	否 NO	不适用 N/A	
1	责任船员是否意识到进入封闭处所风险? Are crew members responsible for enclosed space entry aware of the associated risks?	☐	☐	☐	
2	船舶是否对进入封闭处所作业人员进行了有效管控? Are the measures in place to permit to work for visitors and crew members for enclosed space entry?	☐	☐	☐	
3	船舶是否有完整的封闭处所清单? Is there a list of enclosed space identified?	☐	☐	☐	
4	船舶封闭处所是否正确标识和控制? Are the enclosed spaces marked and for authorized personnel only?	☐	☐	☐	
5	气体检测与监测设备是否定期检测和校准? Are the atmosphere testing devices regularly checked and calibrated?	☐	☐	☐	
6	应急救援与防护设备是否良好? Are the emergency rescue equipment for enclosed space entry in good condition?	☐	☐	☐	
7	作业人员是否熟悉封闭处所风险评估操作? Are the personnel familiar with the safe entry and risk assessment procedures for enclosed space?	☐	☐	☐	
8	作业人员是否熟悉安全防护用品等设备操作? Are the personnel familiar with the operation of safety protective equipment and devices?	☐	☐	☐	
9	封闭处所进入和救助演习是否符合公约要求? Is the enclosed space entry and rescue drill in accordance with SOLAS Chapter III, Regulation 19.3.3?	☐	☐	☐	
10	封闭处所作业有关体系文件是否在船舶有效实施? Is the SMS related to enclosed space operations effectively implemented on board?	☐	☐	☐	
11	其它问题? Any other questions?				