

Isle of Man Ship Registry Technical Advisory Notice

Enclosed spaces – Recent incident highlighted a lack of awareness of the dangers in a cargo hold

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A recent incident on an IOM registered vessel has again highlighted the lack of awareness of ship's staff to the dangers of enclosed spaces. This TAN has been published to reiterate the dangers of enclosed spaces on board ships.

In the incident in question, the crewmember was in the hold of a bulk carrier which was discharging a cargo of Palm Kernel Expeller (PKE). The hatch covers were open and the hold was partially full of cargo. The crewmember was tasked with using compressed air to clean cargo off the ship's internal structure. While carrying out this duty he was rendered unconscious due to the lack of oxygen in the hold (despite the hatch covers being open). Fortunately, he was rescued from the space and made a full recovery. This incident highlighted a lack of awareness of what constitutes an enclosed space and therefore what triggers procedures to be used.

The IMO defines an enclosed space as:

Enclosed spaces are spaces that have limited openings for entry and exit, inadequate ventilation and are not designed for continuous worker occupancy. The atmosphere in any enclosed space may be oxygen-deficient or oxygen-enriched and/or contain flammable and/or toxic gases or vapours, thus presenting a risk to life.

Enclosed spaces are unique and can in fact include cargo holds, even when the hatches are open, as outlined in the incident above. Therefore, ship operators and ship's crew need to carefully consider what an enclosed space is, as it may not initially appear to be one in the traditional sense.

The following factors are a recurring theme within the industry:

1. Lack of awareness by crewmembers of the potential hazards posed by the improper entry into enclosed spaces; and
2. Lack of identification of what actually constitutes an enclosed space.

Therefore, we would like to re-iterate to all ship managers that they must ensure all the vessels they manage have sufficient information and procedures on the correct identification of enclosed spaces and have safe procedures for personnel entering an enclosed space. The procedures should be based on IMO Resolution A.1050 (27) which contains information on the following areas:

1. the dangers of improperly entering an enclosed space;
2. guidance to seafarer on recognising an enclosed space that they might encounter while performing their day-to-day shipboard tasks;
3. that all seafarers, regardless of rank, must not enter an enclosed space without permission and then, only in accordance with ship management's established procedures;
4. who on-board is authorized to permit entry into an enclosed space; and
5. that the best way for a seafarer to assist a fellow seafarer in trouble inside an enclosed space is to immediately raise the alarm so that an organized rescue can be conducted in accordance with ship management's established procedure.

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

