

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
8th 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 document CCC 8/8

**Submitted by INTERMANAGER, IMarEST, BIMCO, IFSMA, The Nautical Institute,
WISTA International and ITF**

SUMMARY

Executive summary: This document provides comment on the submission by SIGTTO, proposing recommendations relating to the cargo compressor room and revision to resolution A.1050(27), featuring unintended consequences, and provides high level information gathered on matters relating to enclosed space events.

*Strategic direction,
if applicable:* 7

Output: 7.28

Action to be taken: Paragraph 9

Related documents: MSC 101/21/11; CCC 8/8 and resolution A.1050(27)

Introduction

1 Following the consideration of document MSC 101/21/11, the Maritime Safety Committee agreed to a new output on "Revision of the *Revised recommendations for entering enclosed spaces aboard ships* (resolution A.1050(27))". The co-sponsors have concerns regarding the unintended consequences of the proposed amendment to resolution A.1050(27). 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.3).

2 The revision is focused on removing the wording "cargo compressor room" from the list of enclosed spaces contained within paragraphs 2.1 of resolution A.1050(27). SIGTTO explains why these spaces should not be considered as enclosed spaces on Gas Carrying Ships as they are covered by the IGC Code. However, not all ships with cargo compressor rooms are covered by the IGC Code, since not all ships with a cargo compressor room are gas carriers.

Background

3 It is noted that ships, other than gas carriers, are fitted with what could be considered by seafarers as "cargo compressor rooms" for example, to manage emissions of volatile organic compounds from cargoes being carried, primarily crude oils on some vessels, such as shuttle tankers.

4 Should the requirement to remove the wording "cargo compressor rooms" be approved, then, for ships without the protections afforded by the IGC Code, the risk and hazard to seafarers for entry into those spaces would be increased as the layers of protection currently afforded to seafarers by treating such spaces as "an enclosed space", required by the existing wording, has been removed.

5 INTERMANAGER has for some years been maintaining comprehensive records of enclosed space incidents which have occurred on board vessels. Unfortunately, not many are well known as they are not recorded within the IMO GISIS database and some remain under investigation, for example the loss of two seafarers and five stevedores in an enclosed space incident on the **MT Nord Magic, M/S Wei He and Berge Mawson**, which have all occurred in May and June 2022.

6 It is noted that within the period of release of the amended recommendations for entering enclosed spaces aboard ships, resolution A.1050(27) on the 30th November 2011 and the date of this submission, 68 enclosed space incidents have resulted in 106 fatalities on ships. No recorded deaths have occurred within the cargo compressor room of gas carriers covered by the IGC Code, although we cannot comment if any near misses occurred within cargo compressor rooms, or how many incidents have been prevented by the current wording contained within resolution A.1050(27).

7 Given the ongoing number of enclosed space incidents, particularly the high numbers of fatalities occurring within enclosed spaces on ships, and while taking into account the existing protection that the current resolution A.1050(27) affords seafarers, consideration of a fuller review of resolution A.1050(27) rather than a small amendment may be more appropriate. A comprehensive review would offer the opportunity to utilize 11 years or more of information, identify areas of commonality, and provide solutions to further reduce the risk of entry into enclosed spaces on ships for seafarers. A single revision of resolution A.1050(27) would be less confusing than having to deal with multiple revisions in quick succession and might also be a safer option to undertake the more substantial revision of A.1050(27) rather than progress the current suggested course of action.

Proposal

8 It is proposed that the term "cargo compressor room" is retained in the list of examples for the reasons stated and is suffixed by: "with the exception of gas carriers that are covered by the IGC Code" thus achieving the aims of SIGTTO and others while retaining the protection for non-IGC Code vessels.

Action requested of the Sub-Committee

9 The Sub-Committee is invited to consider the information, and the proposal in paragraph 8, and take action as appropriate.