

Enclosed space entry: stop, think, act, stay alive

AUTI

The challenge of safely entering enclosed spaces is a topic which has tragically been with the industry for many decades as numerous seafarers, surveyors and stevedores have lost their lives in enclosed spaces on ships and offshore units. Many of these fatalities could have been avoided if the correct procedures had been in place and followed. It is of utmost importance that persons entering an enclosed space protect themselves; even more so when they assist others in need.



March 2024

With this circular, MS Amlin Marine promotes further awareness of the dangers and risks associated with the entry of enclosed spaces by providing information and practical recommendations.

What is an enclosed space?

An enclosed space is a space which can be identified as such by asking the following questions:



If the answer to one of these questions is 'yes', the space should **not** be entered until an appropriate risk assessment has been carried out.

Some enclosed spaces may not be immediately obvious, such as a storage room or a cargo hold. Furthermore, an enclosed space may initially be considered safe, but if adjacent to an unsafe space, it can soon become unsafe if migration of hazardous vapour occurs.

Any area on the ship that has been left closed for any length of time without ventilation must be considered dangerous.



The Risks

Enclosed spaces are dangerous due to the lack of oxygen. Low oxygen levels can be a result of oxidation inside empty tanks or works that have been carried out, such as welding or cutting, a chemical reaction or a bacterial action. In addition, cargoes can absorb oxygen or emit gasses which displace oxygen or are inherently dangerous.

A shortage of oxygen affects the brain faster than any other part of the body. Oxygen levels below 10% will cause unconsciousness and if levels drop below 5%, brain damage will be permanent. Furthermore, an individual can die within minutes if not resuscitated and removed to a fresh atmosphere.

Other contributory factors are insufficient knowledge, training and understanding of the dangers related to enclosed spaces. Humans are used to act on emotion, and panic may result in impulsive actions. Over the last couple of years we have seen many cases where, during an emergency, Personal Protective Equipment (PPE) or rescue equipment is not used by neither the victims nor the first responders and the rescue attempts are not coordinated correctly. Fatalities and injuries happen with regularity and most of them have a similar story.

A person enters an enclosed space without performing a risk assessment, not taking precautionary measures, and loses consciousness. Another person notices the first person lying on the floor and, without thinking, goes inside the space to assist. He also collapses due to the low oxygen level. Sadly, it often doesn't stop with the second person, as there will be a third or even a fourth one trying to perform a rescue operation and simply forgetting to take care of themselves. These uncoordinated rescue attempts can easily result in multiple severe injuries or fatalities, most of which could have been avoided if the correct procedures had been followed.

How to prevent accidents

The IMO has produced two recommendations to minimise the continued loss of life resulting from personnel entering shipboard spaces in which the atmosphere is oxygen depleted, oxygen enriched, toxic or flammable. These recommendations are mandatory for all ships (SOLAS Chapter III Regulation 19.3.6 and SOLAS Chapter XI 1, Regulation 7). Furthermore, the ISM Code requires that all known risks on board ships have to be identified and taken account of. Enclosed spaces are known risks, so these requirements should be fulfilled. These requirements are set out below:

Risk assessment

Before entering an enclosed space, a risk assessment must be carried out. The purpose of such an assessment is to:

- identify the hazards;
- deciding on the control measures; and
- finding alternatives or solutions to mitigate the risks.

A risk assessment should be carried out each and every time before entering an enclosed space or any other area that is potentially dangerous.

• Work permit

In addition to the risk assessment, an authorised work permit should be issued by the safety officer or the Master. This document should specify:

- the exact location of the planned work;
- the nature and the limitations of the work;
- potential hazards;
- the precautions to be taken;
- actual oxygen levels and gas presence, and
- which protective equipment should be used.

The work permit has to be signed by all parties involved and recorded. The Risk Assessment should be attached to the Work permit.

• Drills

Regular drills will help crew members to understand and anticipate the dangers associated with enclosed spaces. They will become familiar with the rescue procedures and the rescue equipment. Training to enter enclosed spaces in a hands-on environment gives crew members valuable hand-on experience and the confidence needed in a real emergency situation. To be effective, the drills should be as realistic as possible and repeated every two months. Enclosed spaces drills should include:

- defining the enclosed spaces on board the vessel/ unit;
- testing the use of PPE and rescue equipment;
- testing the use of communication equipment and procedures;
- testing and using instruments for measuring the atmosphere in enclosed spaces;
- first aid and resuscitation techniques;
- thorough evaluation of the drill and identification of areas that have to be performed;
- making a risk assessment and a work permit.

Practice does not only make perfect preparedness, but it also makes the training and the knowledge permanent and instinctive.

Conclusion and recommendations

Fatalities will only be prevented when ship owners and managers implement and ensure compliance with procedures on board. Regular drills will help crew members to understand the dangers and make them familiar with the rescue procedures. Most importantly, all potentially dangerous spaces should be clearly identified on board by warning signs posted adjacent to their access points.



3

General recommendations:

- Strictly follow all shipboard procedures.
- Enclosed spaces should be identified and clearly marked.
- The space has to be well ventilated before entry.
- A thorough risk assessment to be carried out prior work.
- A proper permit to work has to be filled out and signed.
- The space has to be checked for oxygen content and other gas content by means of a calibrated oxygen analyser and gas detector.
- An oxygen analyser and gas detector should always be carried while being inside the enclosed space and it should be on all the time to monitor the oxygen content. As soon as the oxygen level drops, the analyser should give alarm and the space should be evacuated as soon as possible.
- One person always has to be standby at the entrance of the enclosed space to communicate with the persons inside and the duty officer.
- Adequate rescue equipment has to be present at the entrance to the enclosed space.
- The rescue equipment has to be used without a doubt in an emergency.

The IMO's recommendations for entering enclosed spaces aboard ships are outlined in Resolution A.1050(27)

This information is meant for guidance only. Should you require more information or assistance, please feel free to contact our Loss Prevention Service Department: LPS@msamlin.com



Pieter Bruins

Loss Prevention Executive

+31 10 799 5800 pieter.bruins@msamlin.com

The content of this circular was prepared by MS Amlin for the addressee and for informational purposes only. It does not constitute legal advice. Nothing in this information should be interpreted as providing guidance on any question relating to policy interpretation, underwriting practice, or any other issues in insurance coverage. No warranties are made regarding the thoroughness or accuracy of the information contained in this content, and MS Amlin is not responsible for any errors or omissions. Use of it is at the user's own risk and MS Amlin expressly disclaims all liability with respect to actions taken or not taken based on any contents of it. No rights can be derived from it under any circumstances.

MS Amlin offices

Antwerp, Hamburg, London, Paris, Rotterdam and Singapore



© March 2024. The information contained herein is intended to be for informational purposes only and is correct at the time of printing. This brochure is not, and is not intended to be construed as, an offering of MS Amlin securities in the United States or in any other jurisdictions where such offers may be unlawful. The services and products mentioned in this brochure may not be available in the United States or in jurisdictions where Lloyd's does not have a trading license. Potential insureds should consult with an appropriately licensed broker in their area for further information. MS Amlin Underwriting Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under reference number 204918. Registered office The Leadenhall Building, 122 Leadenhall Street, London EC3V 4AG. Registered in England Company No. 02323018. MS Amlin Marine N.V. is registered in Belgium no. 0670.726.393. Registered address: office is Koning Albert II-laan 37, 1030, Brussels, Belgium. MS Amlin (MENA) Limited is regulated by the Dubai Financial Services Authority (DFSA). MS Amlin (MENA) Limited may only undertake the financial services activities that fall within the scope of its existing DFSA licence. MS Amlin (MENA) Limited's principal place of business in the DIFC is MS Amlin (MENA) Limited, Level 3, Precinct Building 2, Dubai International Financial Centre, Dubai, United Arab Emirates. P.O. Box 506929. This document is intended for Professional clients only as defined by the DFSA and no other person should act upon it. MS Amlin Asia Pacific Pte Limited is approved by the Monetary Authority of Singapore to underwrite on behalf of the members of Syndicate 2001 at Lloyd's. Registered in Singapore No. 200711910C Registered for the members of Syndicate 2001 at Lloyd's. Registered in Singapore No. 200711910C Registered of Street #03-01 CapitaGreen Singapore 048946.