REVISION OF THE RECOMMENDATIONS FOR ENTERING ENCLOSED SPACES ABOARD SHIPS

Draft guidance for tank entry on chemical tankers

Submitted by the Oil Companies International Marine Forum (OCIMF)

SUMMARY

Executive summary: This document comments on document FP 54/17/1 by IPTA proposing guidance on enclosed space entry specifically for chemical tankers. The submitter believes that there is no compelling need to produce specific guidelines for chemical tanker operations, as the existing Assembly resolution covers all oxygen deficient, flammable and/or toxic atmospheres. Additionally, having two sets of guidelines would increase complexity and confuse shipboard operational practices particularly when crews move from Annex 2 ships to Annex 1 and vice versa.

Strategic direction: 5.4
High-level action: 5.4.1
Planned output: No related provisions
Action to be taken: Paragraph 10
Related documents: Resolution A.864(20); FP 53/WP.5; FP 54/17/1 and DSC 15/10

Introduction

1 This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the organization and method of work of the MSC and MEPC and their subsidiary bodies (MSC-MEPC.1/Circ.2) in order to provide comment on document FP 54/17/1.

2 At FP 53 it was agreed that the fitting of appropriate inert gas systems to new oil tankers of less than 20,000 tonnes deadweight and new chemical tankers carrying low-flash point cargoes would minimize the risk of fires and explosions.

3 In document FP 54/17/1, International Parcel Tankers Association (IPTA) proposed that, due to the possible extension of the inert gas requirement to chemical tankers, there is a need to create enclosed space entry guidelines specifically for chemical tankers. OCIMF do not agree that there is such a need.
No compelling need

4 OCIMF do not accept that compelling need has been demonstrated which justifies the introduction of specific guidance to shipboard personnel working onboard ships where nitrogen is used as an inert gas. Assembly resolution A.864(20) on Recommendations for entering enclosed spaces aboard ship, covers all oxygen deficient, flammable and/or toxic atmospheres and so includes nitrogen inerted spaces. Therefore, there is no necessity to produce specific ship type guidelines.

The Human element

5 The management of entry into enclosed spaces is an issue in which the human element plays a crucial and pivotal role. Document DSC 15/10 by the Marine Accident International Investigators Forum (MAIIF), focused on the failings of the Human element which included the active disregard of guidelines. In essence, we must ensure that seafarers working on board any and all ship types fully appreciate the unique risks associated with enclosed space entry. The issues of the human element would only be exacerbated by the addition of the guidelines outlined in document FP 54/17/1. As shown in document DSC 15/10, the application of one set of guidelines is problematic without the complication of an additional set of guidelines running in parallel. Additional and possibly conflicting guidance would create the possibility of further confusion for the seafarer. OCIMF believe that a simple and robust process is the best approach to address issues of the human element.

No increased risk

6 In paragraph 1 of document FP 54/17/1, IPTA states that, "If the application of inert gas were to be mandated for chemical tankers, this would lead to a significant increase in the use of nitrogen and the associated risks in relation to cargo tank entry". It should be noted that FP 53 did not agree that there would be this level of certainty as to the tank entry risks, as it was stated in paragraph 5.12 of document FP 53/WP.5: "... it was also pointed out that inerting may increase the risk associated with tank entries ....".

7 OCIMF do not believe that there is an increase in the risks to personnel from the introduction of inert gas to chemical tanker operations over and above the existing risks to personnel from enclosed space entry. Simply put, the risks to personnel from entering a space that is inerted with nitrogen, are the same as for a non-inerted, non-gas free space. In both instances, the atmosphere will not sustain life. As stated in paragraph 5.14 of document FP 53/WP.5, "The group agreed that any tank entry is always hazardous, whether tanks have been inerted or not, and that an empty tank does not equal a safe tank. The importance of following established procedures for entering enclosed spaces was stressed".

8 Taking a holistic view, the use of inert gas for cargoes with low flash points will reduce the overall risks to personnel on chemical tankers by reducing the risk of fire and explosion.

Summary

9 In summary, OCIMF do not support the creation of guidelines as outlined in document FP 54/17/1 due to:

1 the existing guidelines already cover enclosed space entry;
.2 the absence of any increase in the risk to personnel following the existing guidance when entering an enclosed space whether it has been inerted or not; and

.3 the increased risk of confusion involved with having two sets of guidelines.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the above and take action as appropriate.