UNIFIED INTERPRETATION TO PROVISIONS OF IMO SAFETY, SECURITY,
AND ENVIRONMENT-RELATED CONVENTIONS

Consideration of the possible need for the revision of Guidelines on the means
of access to structures for inspection and maintenance of oil tankers
and bulk carriers (MSC/Circ.686)

Background

1. The Sub-Committee, at its second session, considered document SDC 2/21 (IACS),
providing in its annex a copy of the latest version of IACS UI SC191 relating to the application
of SOLAS regulation II-1/3-6, as amended, and the revised Technical Provisions on means of
access for inspections.

2. In this connection, in considering the actions requested set out in paragraph 9 of
document SDC 2/21, SDC 2, noted in particular that:

   .1 the footnote to paragraph 3.1 of SOLAS regulation II-1/3-6 referring to the
   Revised recommendations for entering enclosed spaces aboard ships,
   adopted by the Organization by resolution A.1050(27), has already been
   updated by the Secretariat in the SOLAS Consolidated Edition 2014; and

   .2 while conducting the latest review of the provisions relating to SOLAS
   regulation II-1/3-6, as amended, and the revised Technical Provisions on
   means of access for inspections, it has come to the attention of IACS that
   both IACS UI SC191 and MSC.1/Circ.1464/Rev.1 include several references
to MSC/Circ.686. In this context, the observer from IACS was of the view that
it may be appropriate to review the Guidelines on the means of access to
structures for inspection and maintenance of oil tankers and bulk carriers
(MSC/Circ.686), approved by MSC 65 in May 1995, in particular considering
the 2011 ESP Code (resolution A.1049(27)), as amended.
3 In considering matters related to the possible need for the revision of *Guidelines on the means of access to structures for inspection and maintenance of oil tankers and bulk carriers* (MSC/Circ.686), SDC 2, having noted the views that this matter needs further consideration in order to clarify if there is a need for a new output, requested the Secretariat to prepare a proposal for submission to SDC 3.

**Possible need for the revision of Guidelines on the means of access to structures for inspection and maintenance of oil tankers and bulk carriers (MSC/Circ.686)**

4 As requested by SDC 2, the Secretariat considered the *Guidelines on the means of access to structures for inspection and maintenance of oil tankers and bulk carriers* (MSC/Circ.686), in the context of the 2011 ESP Code (resolution A.1049(27)), in order to first verify if the text of the Guidelines has been incorporated into the Code, and if not, if there is a need for revising the Guidelines, as they were approved by MSC 65 (9 to 17 May 1995) and therefore may be obsolete.

5 There are aspects of the aforementioned Guidelines that have not been incorporated into the 2011 ESP Code, for example the minimum clear dimensions of horizontal openings (hatches and manholes) which should not be less than 600 mm by 600 mm. However, the relevance of SOLAS regulation II-1/3-6 and the *Technical provisions for means of access for inspections* (resolution MSC.133(76)) may also need to be considered. The Guidelines could still be considered as an independent instrument which may or may not need a complete revision.

6 It should be noted that throughout the text there are some references that need to be updated, e.g. the footnote to paragraph 5 of the "General" section refers to chapter 11 of the International Safety Guide for Oil Tankers and Terminals (ISGOTT) – "Entry into and work in enclosed spaces" and to IMO Guidelines on entry into enclosed spaces, to be developed by the Organization.

7 In light of the above, before any decision is taken on this matter, the Sub-Committee needs to clarify if the *Guidelines on the means of access to structures for inspection and maintenance of oil tankers and bulk carriers* (MSC/Circ.686) are still in use by the industry.

8 If the Sub-Committee confirms that the Guidelines are still in use, it may consider the need to revise them, taking into account a gap analysis and harmonization with the 2011 ESP Code and any other related instruments, which would require a justification for a new output, or for an expansion of the output on "Amendments to the 2011 ESP Code (2.0.1.7)". Consequently, the Sub-Committee may take action as follows:

.1 invite Member Governments to submit a proposal for a new output to MSC 96, taking into account the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environmental Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.4). In this connection, it should be noted that the deadline for proposals for new outputs to be considered by MSC 96 is Tuesday, 9 February 2016; or

.2 request the Secretariat to prepare such a justification, for consideration by the Sub-Committee.
Action requested of the Sub-Committee

The Sub-Committee is invited to:

.1 consider whether the *Guidelines on the means of access to structures for inspection and maintenance of oil tankers and bulk carriers* (MSC/Circ.686) are still in use by the industry, and take action as appropriate (paragraph 7);

.2 if the aforementioned Guidelines are still in use, consider the need to revise the Guidelines, taking into account a gap analysis and harmonization with the 2011 ESP Code and any other related instrument (paragraph 8);

.3 decide whether a justification should be prepared for a new output, or for an expansion of the output on "Amendments to the 2011 ESP Code (2.0.1.7)" (paragraph 8); and

.4 decide how this justification should be submitted to the Committee, and take action as appropriate (paragraph 8.1 or 8.2).