

DON'T CURE PREVENT

ISSUE 26 FEBRUARY 2025



ENCLOSED SPACE REGISTER



ENCLOSED SPACE REGISTER



CASE

Over the past six months, during the **PAS pre-vetting (RISQ 3.1)** inspections a recurring finding in 50% of cases is recorded ***Absence of an 'Enclosed Space Register' onboard.***

Additionally, during **PAS SMS gap analysis assessments for RISQ 3.1 compliance**, it was found that in 80% of cases, company procedures do not document the development of an 'Enclosed Space Register', comprising a significant gap in RISQ 3.1 requirements.

BACKGROUND

RISQ 3.1 (Ref.: Question 4.5) guidelines for enclosed spaces have been updated in comparison with previous 3.0 version. The new version includes the enclosed space register, measures for securing the access door of the enclosed space and provisions for the safety of shore-side personnel and stevedores onboard ships.

Enclosed spaces on the vessels should be identified through a thorough risk assessment process, as outlined in **Annex 1.2 of the Code of Safe Working Practices for Merchant Seafarers**. Through this process, there should be an assumption that ***the space to be entered is hazardous until proven to be safe for entry.***

ENCLOSED SPACE REGISTER - RECORDING REQUIREMENTS (AS PER RISQ 3.1 - QUESTION 4.5)

- 🕒 Space characteristics: layout, access, and exit points.
- 🕒 Potential hazards.
- 🕒 Entry prevention measures: locks and signage.
- 🕒 Entry procedures: ventilation time.
- 🕒 Ventilation equipment and storage location.
- 🕒 Lighting needs, including temporary lighting.
- 🕒 Atmospheric testing requirements.





REGULATORY FRAMEWORK

- ⦿ **RISQ 3.1 (QUESTION 4.5)**
- ⦿ **SIRE 2.0 (QUESTION 5.5.1)**
- ⦿ **CODE OF SAFE WORKING PRACTICES FOR MERCHANT SEAFARERS (CHAPTERS 1- ANNEX 1.2 AND 15)**
- ⦿ **INTERNATIONAL SAFETY GUIDE FOR OIL TANKERS & TERMINALS (PARAGRAPH 10.7.3)**



WHAT WENT WRONG?

- ✗ Enclosed space register not available on board or not up to date.
- ✗ Incomplete or not available enclosed space risk assessments.
- ✗ Spaces where the risk of a change in atmosphere was significant were not included in the Enclosed space register.



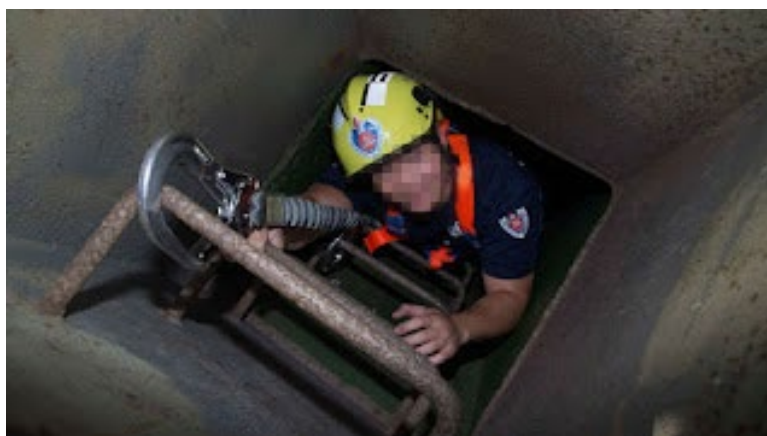
OUR SUGGESTION

- ⦿ Establish and maintain an updated Enclosed space register, that includes all enclosed spaces along with the necessary space-specific information as per RISQ 3.1.
- ⦿ Regularly review and update the Enclosed space register.
- ⦿ Conduct thorough risk assessment for the identification of all enclosed spaces as per COSWP/Annex 1.2.
- ⦿ Train the responsible onboard and office personnel for maintaining an accurate enclosed space register.



BEST PRACTICE

- ✓ Amend your SMS as necessary to enforce the development of the enclosed space register and training of engaged personnel, as per RISQ 3.1 requirements
- ✓ Ensure that enclosed space register is ship specific.
- ✓ Define specific filing requirement onboard and ashore for the Enclosed space register.



 **PREVENTION AT SEA**

DON'T CURE PREVENT

ISSUE 26 **FEBRUARY 2025**

FOR MORE INFORMATION,
PLEASE DO NOT HESITATE TO CONTACT US.



Prevention at Sea Ltd

5 Artemidos Avenue, 6th Floor,
Artemidos Tower, 6020
Larnaca - Cyprus

Tel: +357 24819800

Fax: +357 24819881



PREVESEA Ltd

91 Akti Miaouli Str., 3rd Floor
Piraeus 18538
Athens - Greece

Tel: +30 210 64 37 637



sales@preventionatsea.com



www.preventionatsea.com