

Expert thinking on critical issues

SAFETY4SEA, in association with the North of England P&I Club, discusses topical industry issues.

Q: "Does enclosed space entry need more regulation?"



David Patterson
Loss Prevention
Executive,
The North of England
P&I Club

Yes Focus should be placed on the training requirements for conducting safe enclosed space entry; STCW should require an enclosed space entry training course with a detailed minimum standard. There is also an issue with equipment. Under SOLAS, vessels -with the exception of tankers- are required to carry at least one portable multi-gas detector. If only one gas detector is onboard it is not possible to compare the readings so total reliance is put on the fact that this detector is calibrated, functioning and being operated correctly. The only way to confirm that an enclosed space is safe to enter is by using a gas detector - the minimum requirement could be increased and also include the requirement for personal gas detectors.



Capt. Sachin Singh
Alternate DPA / CSO,
Fleet Ship Management
Pte. Ltd., Singapore

No What it needs is "common sense" along with "situational awareness". What was once known as 'the good practice of seamen' has now been translated into numerous procedures forming our bulky SMSs. The business needs have driven the seafarer towards ensuring that all go/no-go items on the list are checked, however gradually, it is taking away the onus to think, what he/she is doing. Filling out an ESE checklist in the comfort of your office on the computer, then not testing the air in the space, is definitely not what the industry needs. The key is, "spreading awareness" & build the "culture" of looking out for yourself and your buddies. Regular and quality training, with hands-on experience in ESE procedures while evaluating ESE in totality, are vital.



Artiom Guzar
QA and ISM Manager,
Norbulk Shipping UK
Limited

Yes Enclosed space entry does require further regulations. The obvious proof is the amount of lives that is still taken. One of the possible options is a mandatory course on enclosed space entry. This could be a course on its own or a part of basic training. Such course is already run in Glasgow Nautical College. Further regulations could be applied to the requirements of the future ships' design i.e. the spaces where majority of fatalities are happening could be required to be fitted with gas measurement devices, openings and additional fittings could be considered for an easy and fast evacuation. It is not only the sea staff are affected. Shore stevedores must be educated about the dangers of the enclosed spaces too.



Capt. Kuba Szymanski
Secretary General,
InterManager

Yes New regulation is needed, for example, towards the design of the enclosed spaces. That would include entry points, emergency escape points, provisions for ventilation and atmosphere monitoring in the WHOLE space. Responders to our recent survey into the dangers of enclosed spaces -nearly 5,000 seafarers- were very vocal when it comes to the time pressures placed upon them when working in enclosed spaces and the lack of equipment available to them. Currently there is absolutely no regulation stipulating the minimum/maximum number of people in the enclosed space. Seafarers who responded to our survey were also quick to point out that existing procedures are not compatible with reality, nor even with each other.



Capt. David J Patraiko
Master Mariner, Director of Projects, The Nautical Institute

No The ISM Code clearly requires the identification and mitigation of risk, and given the number of deaths this identification and mitigation of risk is not being done well enough for enclosed spaces. One of the key challenges is for seafarers to understand that the definition of an 'enclosed space' is not just structural, but is based upon the likelihood of a hazardous environment due to poor ventilation, and often the type of cargo being carried. A space adjacent to a cargo space that has a low risk on one voyage may have a high risk with a different cargo on the next voyage! The NI continues to address these issues in our publications, courses, MARS and at the IMO.



Stefanos Stylianou
HSQE & Marine
Manager / DPA,
MINERVA MARINE Inc.

No The need for more regulation is not the silver bullet. Our industry has reached a stage where procedures, permit to work and risk assessment process is mature and accounts for all the hazards and required mitigating measures, in theory. Incidents start happening when we ignore or overlook hazards, change parameters and application of available instructions. This is not so simple to cure and should start with our education, training & safety culture, on-board and ashore. We must ensure that our seafarers are adequately trained and familiarized with their duties. Thus, officers are familiar with procedures and strictly abide to the SMS and permit to work, use the system for guidance and instruction and not only as a paperwork exercise.



A safety column in association with the

North