



# Antigua and Barbuda Maritime Administration

**SUBJECT:** Enclosed space entry

**REFERENCE:**

- a) *SOLAS Chapter III Regulation 19 and Chapter XI-1 Regulation 7*
- b) *IMO Resolution MSC.581(110), Revised recommendations for entering enclosed spaces aboard ships, adopted 27 June 2025*
- c) *IMO Circular MSC.1/Circ.1477, Guidelines to facilitate the selection of portable atmospheric testing instruments for enclosed spaces as required by SOLAS Regulation XI-1/7, issued 09 June 2014*
- d) *IMO Circular MSC.1/Circ.1561, Unified interpretation of SOLAS Regulation XI-1/7, issued 28 November 2016*
- e) *IMO Circular MSC.1/Circ.1581, Unified interpretation of SOLAS Chapter II-2, issued 16 June 2017*
- f) *Code of Safe Working Practices for Merchant Seafarers (COSWP)*

**TO:** Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and Recognized Organizations.

## 1. PURPOSE

This Circular establishes the requirements of the Antigua and Barbuda Department of Marine Services and Merchant Shipping (ADOMS) and highlights the safety standards to be followed when personnel enter enclosed spaces on board ships flying the flag of Antigua and Barbuda.

These requirements are issued in recognition of the continuing loss of life resulting from entry into enclosed spaces where the atmosphere may be oxygen-deficient, oxygen-enriched, toxic, or flammable.

This Circular draws attention to the revised recommendations for safe entry into enclosed spaces as adopted by the International Maritime Organization under Resolution MSC.581(110). The guidance highlights that atmospheres should be tested for hazardous gases, including carbon dioxide (CO<sub>2</sub>), where a risk assessment indicates its potential presence. Entry into any enclosed space should only occur once it has been verified as safe through proper testing and ventilation.

## 2. APPLICATION

This Circular applies to all Antigua and Barbuda flagged ships.

## 3. BACKGROUND

Enclosed space entry continues to be a cause of serious accidents and fatalities at sea, despite longstanding regulatory and industry safety efforts. Incidents often involve asphyxiation, toxic atmospheres, or explosions, and can affect multiple crew members, including those attempting rescue.

#### 4. OBLIGATIONS AND RESPONSIBILITIES

1. Shipowners, operators, and masters are reminded to ensure that shipboard procedures, risk assessments, and crew training related to enclosed space entry are fully implemented in accordance with the applicable regulations and guidance referenced in this Circular.
2. Mandatory requirements related to enclosed space entry are contained in the International Convention for the Safety of Life at Sea (SOLAS). In particular:

1. SOLAS Chapter III, Regulation 19 – Drills and Exercises

1. This regulation requires that all ships conduct regular drills and exercises to ensure the safety of the crew. Specifically, it mandates that enclosed space entry drills be carried out so that personnel are familiar with procedures for safe entry, emergency response, and rescue operations. These drills must be documented, conducted at intervals specified in the ship's Safety Management System (SMS), and include practical training in the use of safety equipment, communication, and monitoring of atmospheric conditions. The purpose is to ensure that all relevant crew members understand the risks of enclosed spaces and can act effectively in emergencies.

2. SOLAS Chapter XI-1, Regulation 7 – Carriage of Test Equipment

1. All ships must carry appropriate portable instruments to test the atmosphere in enclosed spaces before anyone enters. At a minimum, these instruments should be able to measure:
  1. Oxygen levels
  2. Flammable gases or vapours
  3. Hydrogen Sulphide
  4. Carbon monoxide
2. Ships must ensure that these instruments are properly maintained and calibrated in accordance with manufacturer instructions.

3. IMO Resolution MSC.581(110) – Revised Recommendations for Entering Enclosed Spaces Aboard Ships (adopted 27 June 2025)
  1. IMO Resolution MSC.581(110) contains revised non-mandatory international recommendations regarding the safe entry into enclosed spaces on board ships. The Resolution reflects current experience and best practices and is intended to support the effective implementation of existing mandatory provisions, including those in SOLAS and the ISM Code. It provides detailed guidance on risk assessment, pre-entry planning, atmosphere testing, ventilation, entry procedures, continuous monitoring, communication, and emergency preparedness. Shipowners, operators and masters are encouraged to incorporate these recommendations into shipboard procedures and safety management systems.
4. With respect to atmospheric hazards, the IMO Resolution MSC.581(110) guidance highlights that carbon dioxide (CO<sub>2</sub>) may be present in enclosed spaces and, where relevant, should be considered when assessing the atmosphere prior to entry. The recommendations state that measurement of CO<sub>2</sub> is advisable where a risk assessment indicates the potential for its presence. However, the Resolution does not establish a new mandatory requirement to carry dedicated CO<sub>2</sub> measuring instruments. The carriage of test equipment for specific gases remains subject to existing SOLAS requirements and the outcome of the ship's risk assessment. Where CO<sub>2</sub> is identified as a potential hazard, appropriate means to verify its absence or safe concentration must be provided before entry is permitted.
5. The Code of Safe Working Practices for Merchant Seafarers (COSWP) provides guidance and recommended procedures for safe entry into enclosed spaces, including risk assessment, atmosphere testing, ventilation, and emergency preparedness. While COSWP is not a mandatory instrument, it represents the industry's best practice and is widely accepted as a standard for safe shipboard operations. All seafarers on board Antigua and Barbuda flagged ships should be guided by COSWP when undertaking work and preparing for work tasks, including enclosed space entry, to ensure that operations are conducted safely and in accordance with recognized good practice.

**Issued by**  
Antigua and Barbuda  
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