



JAPAN P&I NEWS

外航組合員各位

中国—中国 **MSA** による船内の閉鎖空間への不法な立ち入りに対する特別取り締まりの実施について

近年、船舶の閉鎖空間への不法な立ち入りによる事故発生は増加傾向にあり、このような事故の発生を防止・抑制するため、中国 **MSA** は、船内の閉鎖空間への不法な立ち入りに対する取り締まりを実施しています。主な概要は以下のとおりです。

実施期間：

2025 年 1 月 15 日から 2025 年 10 月 14 日まで

対象となる船舶：

以下の定義を満たす閉鎖空間を有する船舶および水上施設。閉鎖空間とは以下いずれかの条件を有する空間とする。

1. 出入口が制限されている
2. 換気が不十分
3. 作業員が継続的に使用するよう設計されていない

特別検査は、以下の場合を除いて原則として同一船舶において一回のみ実施されます。

1. 船内の閉鎖空間への不法な立ち入りにより、事故や危険な状況が発生した場合
2. 現場での検査中、閉鎖空間への立ち入り管理に重大な問題やリスクが確認された場合
3. 閉鎖空間への立ち入り管理に重大な問題やリスクがあるとして船舶名の報告があった場合
4. 中国 **MSA** により特別検査が必要と指定された場合

国籍にかかわらず中国の港に寄港するすべての船舶が対象となっています。船舶の運航と管理において、乗組員への周知、安全管理システムを順守した適切な管理を行い、検査のチェックリストの内容に沿って自主点検を実施するようにしてください。詳細については、中国のコレスポンデント **Huatai Insurance Agency & Consultant Service Ltd.** から入手した添付資料をご参照ください。

以上

添付資料：Huatai Circular No.PNI (2025) 01



**HUATAI
MARINE**

CIRCULAR |

| www.huataimarine.com

| pni.bj@huatai-serv.com

| Duty Phone: +86 13701125026

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China MSA Launched a Special Campaign against Illegal Entry into Enclosed Spaces onboard Ships

Dear Sir/Madam,

It is reported that China Maritime Safety Administration (China MSA) has recently launched a nine-month special campaign against illegal entry into dangerous enclosed spaces onboard ships. On basis of the information we

obtained thus far, we have prepared this Circular to briefly introduce the special campaign and provide relevant suggestions for the reference of the Clubs and their Members.

The Main Contents of the Special Campaign

Period of Special Campaign

From January 15 to October 14, 2025.

Targets of Special Campaign

Ships and waterborne facilities equipped with enclosed spaces that meet the following definitions.

Enclosed space means a space which has any of the following characteristics:

1. limited openings for entry and exit;
2. inadequate ventilation; and
3. is not designed for continuous worker occupancy.

Enclosed spaces include, but are not limited to, cargo spaces, double bottoms, fuel tanks, ballast tanks, cargo pump-rooms, cargo compressor rooms, cofferdams, chain lockers, void spaces, duct keels, inter-barrier spaces, boilers, engine crankcases, engine scavenge air receivers, sewage tanks, and the adjacent connected spaces which are normally unventilated and not used for cargo storage but which may share the same atmospheric characteristics with the enclosed spaces.

Frequency of Inspection

In principle, only one special inspection shall be carried out onboard the same ship during the special campaign period, except for the following situations:

1. Where an accident or dangerous situation is triggered due to illegal entry into the enclosed space onboard a ship.
2. Where serious deficiencies or potential risks in the management of entering enclosed spaces onboard the ship are identified during on-site ship supervision.
3. Where a ship is reported under real name for serious problems or potential risks in the management of entry into the enclosed spaces.
4. Where special inspections are required as designated by the MSA of the Ministry of Transport.

Key Points of Inspection

The special campaign action plan provides an inspection checklist with the following contents:

1. Are crew members responsible for enclosed space entry aware of the associated risks?
2. Are the measures in place to permit to work for visitors and crew members for enclosed space entry?
3. Is there a list of enclosed space identified?

4. Are the enclosed spaces marked and for authorized personnel only?
5. Are the atmosphere testing devices regularly checked and calibrated?
6. Are the emergency rescue equipment for enclosed space entry in good condition?
7. Are the personnel familiar with the safe entry and risk assessment procedures for enclosed space?
8. Are the personnel familiar with the operation of safety protective equipment and devices?
9. Is the enclosed space entry and rescue drill in accordance with SOLAS Chapter III, Regulation 19.3.3?
10. Is the SMS related to enclosed space operations effectively implemented on board?

Huatai Suggestions

In recent years, the number of accidents caused by the act of illegally entering enclosed spaces has been increasing year by year, and such illegal acts have pose serious threaten to the safety of both personnel and ships. In view of this, China MSA has launched a special campaign on the illegal entry into enclosed spaces onboard ships, aiming to standardize the behavior of operation personnel entering enclosed places onboard ships and prevent and curb the occurrence of such accidents.

Viewing from an organizational perspective, the special campaign is similar to the Concentrated Inspection Campaign (CIC) held annually by some PSC

Memorandum of Understanding organizations, but the inspection period of this campaign is much longer than the PSC CIC. According to the requirements of the special campaign, it will be conducted in combination with the daily supervision and management of shipping companies, safety management system audits, ship safety inspections and on-site supervision, etc. The targets of this special campaign are the ships entering Chinese ports, regardless of their nationality.

In order to effectively respond to this long-term special campaign and avoid the identification of deficiencies related to illegal entry into enclosed spaces during the flag state / PSC inspection, we suggest that whilst conducting self-inspection in accordance with the items listed in the above mentioned inspection checklist, the Shipowners, Managers / Operators and ships should also draw their particular attention on the following aspects in order to pass the inspection smoothly:

1. Self-check the relevant procedures in the SMS documents

Check and confirm that the ship's SMS documents contain the safety operation procedure for guiding the personnel entering enclosed spaces, the emergency response and rescue plan and the maintenance procedure/plan for the safety equipment, communication devices, rescue and first aid tools which are necessary for entering enclosed spaces by way of a thorough self-inspection. The SMS documents should be modified and improved in accordance with appropriate procedures if the aforementioned procedures / plans are found to be absent.

2. Establish and strictly comply with the risk assessment and entry permit system

Ensure that crew members possess the ability to determine the various types

of hazards and risk levels that may exist in the enclosed spaces by comprehensively analyze on the various factual conditions such as cargo type, ventilation status, operation type, gas composition, tank coating, adjacent area conditions, etc., and able to propose reasonable measures to reduce the corresponding risks to an acceptable level and keep proper records. After sufficient risk assessment, an authorized entry permit from the master or the designated person in charge shall be obtained before entering. Furthermore, the entry permit should be kept on board along with the risk assessment documents for inspection.

3. Physical inspection of enclosed spaces and the related equipment

Ships should regularly identify and establish a list of enclosed spaces on board. Through regular inspections, ships shall confirm that the entrances or passageways to the enclosed space are in good maintenance condition, free from obstacles that could affect the safe entry of personnel and rescue operations; the internal structures within the enclosed spaces are complete, safe and reliable; the connecting ventilation systems are working properly; and the interior equipment such as lighting, fixed gas monitoring equipment, water level detectors (if any), etc. are in good working condition. In addition, regular inspection should also be carried out to ensure the personal protective equipment, rescue tools, communication devices etc., are in good order.

4. Training and Emergency Drills

Provide regular training to crew members, conduct drills for entering enclosed spaces strictly in accordance with the requirements of the Convention (every two months) and keep the training and drill records. Through adequate training and drills, ensure that crew members are familiar with their emergency responsibilities, aware of the dangers of enclosed spaces, understand the correct procedures for entering enclosed spaces and familiar with emergency

evacuation and the rescue procedures. Ensure that the responsible personnel can correctly inspect, use, and maintain the protective and rescue equipment, and is proficient in the operating, inspection, testing, and calibration of the fixed and portable gas detection instruments.

Last but not least, it is equally important to promptly notify ships destined for Chinese ports about the ongoing special campaign being carried out by China MSA during this period so that crew members have sufficient time to prepare for the onboard inspections and pass them smoothly.

Should you have any inquiries, please feel free to contact Huatai Beijing (pni.bj@huatai-serv.com) or our local branch offices.

Best regards,

A handwritten signature in black ink, appearing to be 'CUI Jiyu' in a stylized cursive script.

CUI Jiyu

Head of Marine Team