

# SC 191 IACS Unified Interpretations (UI) SC 191 for the application of amended SOLAS regulation II-1/3-6 (resolution MSC.151(78)) and revised Technical provisions for means of access for inspections (resolution MSC.158(78))

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## Note:

1. This UI is to be applied by IACS Members and Associates when acting as recognized organizations, authorized by flag State Administrations to act on their behalf, unless otherwise advised, from 1 January 2005.
2. Rev.1 (May 2005) introduced new Annex to UI SC 191. Rev.1 is to be applied by IACS Members and Associates from 1 July 2005.
3. Rev.2 (Oct.2005) re-categorized the Annex to UI SC191 (Rev.1) as Recommendation No.91.  
  
Rev.2 (Oct.2005 / Corr. Dec. 2005) is to be applied by IACS Members and Associates to ships contracted for construction on or after 1 May 2006.  
  
Refer to IMO MSC/Circ. 1176.
4. The 'contracted for construction' date means the date on which the contract to build the vessel is signed between the prospective owner and the shipbuilder. For further details about the date of 'contract for construction', refer to IACS Procedural Requirement (PR) No. 29.
5. Rev.3 is to be applied by IACS Members and Associates from 1 October 2006.
6. Rev.4 is to be applied by IACS Members to ships contracted for construction from 1 July 2012.
7. Rev.5 is to be applied by IACS Members to ships contracted for construction from 24 June 2013.
8. Rev.6 is to be applied by IACS Members to ships contracted for construction from 1 July 2015.
9. Rev.7 is to be applied by IACS Members to ships contracted for construction from 1 July 2016.
10. Rev.8 is to be applied by IACS Members to ships contracted for construction from 1 July 2019.

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(cont)****SOLAS regulation II-1/3-6, section 1****1 Application**

1.1 Except as provided in paragraph 1.2, this regulation applies to oil tankers of 500 gross tonnage and over and bulk carriers, as defined in regulation IX/1, of 20,000 gross tonnage and over, constructed on or after 1 January 2006.

1.2 Oil tankers of 500 gross tonnage and over constructed on or after 1 October 1994 but before 1 January 2005 shall comply with the provisions of regulation II-1/12-2 adopted by resolution MSC.27(61).

**Interpretation****Oil tankers:**

This regulation is only applicable to oil tankers having integral tanks for carriage of oil in bulk, which is contained in the definition of oil in Annex 1 of MARPOL 73/78. Independent oil tanks can be excluded.

Regulation II-1/3-6 is not normally applied to FPSO or FSO unless the Administration decides otherwise.

**Technical Background**

Means of Access (MA) specified in the Technical provisions contained in resolution MSC.158(78) are not specific with respect to the application to integral cargo oil tanks or also to independent cargo oil tanks. ESP requirements of oil tankers have been established assuming the target cargo oil tanks are integral tanks. The MA regulated under SOLAS regulation II-1/3-6 is for overall and close-up inspections as defined in regulation IX/1. Therefore it is assumed that the target cargo oil tanks are those of ESP, i.e. integral cargo tanks.

Regulation II-1/3-6 is applicable to FPSO or FSO if they are subject to the scope of ESP as contained in the ESP Code, as amended.

**Ref.**

SOLAS regulation IX/1 and the ESP Code, as amended.

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(cont)****SOLAS regulation II-1/3-6, paragraph 2.1**

2.1 Each space shall be provided with a permanent means of access to enable, throughout the life of a ship, overall and close-up inspections and thickness measurements of the ship's structures to be carried out by the Administration, the company, as defined in regulation IX/1, and the ship's personnel and others as necessary. Such means of access shall comply with the requirements of paragraph 5 and with the Technical provisions for means of access for inspections, adopted by the Maritime Safety Committee by resolution MSC.133(76), as may be amended by the Organization, provided that such amendments are adopted, brought into force and take effect in accordance with the provisions of article VIII of the present Convention concerning the amendment procedures applicable to the Annex other than chapter 1.

**Interpretation**

Each space for which close-up inspection is not required such as fuel oil tanks and void spaces forward of cargo area, may be provided with a means of access necessary for overall survey intended to report on the overall conditions of the hull structure.

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(cont)****SOLAS regulation II-1/3-6, paragraph 2.2**

2.2 Where a permanent means of access may be susceptible to damage during normal cargo loading and unloading operations or where it is impracticable to fit permanent means of access, the Administration may allow, in lieu thereof, the provision of movable or portable means of access, as specified in the Technical provisions, provided that the means of attaching, rigging, suspending or supporting the portable means of access forms a permanent part of the ship's structure. All portable equipment shall be capable of being readily erected or deployed by ship's personnel.

**Interpretation**

Some possible alternative means of access are listed under paragraph 3.9 of the Technical Provisions for means of access for inspection (TP). Always subject to acceptance as equivalent by the Administration, alternative means such as an unmanned robot arm, ROV's and dirigibles with necessary equipment of the permanent means of access for overall and close-up inspections and thickness measurements of the deck head structure such as deck transverses and deck longitudinals of cargo oil tanks and ballast tanks, are to be capable of:

- safe operation in ullage space in gas-free environment;
- introduction into the place directly from a deck access.

When considering use of alternative means of access as addressed by paragraph 3.9 of the TP, refer to IACS Recommendation No.91 "Guidelines for Approval/Acceptance of Alternative Means of Access".

**Technical Background**

Innovative approaches, in particular a development of robot in place of elevated passageways, are encouraged and it is considered worthwhile to provide the functional requirement for the innovative approach.

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(cont)****SOLAS regulation II-1/3-6, paragraph 2.3**

2.3 The construction and materials of all means of access and their attachment to the ship's structure shall be to the satisfaction of the Administration. The means of access shall be subject to survey prior to, or in conjunction with, its use in carrying out surveys in accordance with regulation I/10.

**Interpretation****Inspection**

The MA arrangements, including portable equipment and attachments, are to be periodically inspected by the crew or competent inspectors as and when it is going to be used to confirm that the MAs remain in serviceable condition.

**Procedures**

1. Any Company authorised person using the MA shall assume the role of inspector and check for obvious damage prior to using the access arrangements. Whilst using the MA the inspector is to verify the condition of the sections used by close up examination of those sections and note any deterioration in the provisions. Should any damage or deterioration be found, the effect of such deterioration is to be assessed as to whether the damage or deterioration affects the safety for continued use of the access. Deterioration found that is considered to affect safe use is to be determined as "substantial damage" and measures are to be put in place to ensure that the affected section(s) are not to be further used prior effective repair.
2. Statutory survey of any space that contains MA shall include verification of the continued effectiveness of the MA in that space. Survey of the MA shall not be expected to exceed the scope and extent of the survey being undertaken. If the MA is found deficient the scope of survey is to be extended if this is considered appropriate.
3. Records of all inspections are to be established based on the requirements detailed in the ships Safety Management System. The records are to be readily available to persons using the MAs and a copy attached to the MA Manual. The latest record for the portion of the MA inspected is to include as a minimum the date of the inspection, the name and title of the inspector, a confirmation signature, the sections of MA inspected, verification of continued serviceable condition or details of any deterioration or substantial damage found. A file of permits issued is to be maintained for verification.

**Technical Background**

It is recognised that MA may be subject to deterioration in the long term due to corrosive environment and external forces from ship motions and sloshing of liquid contained in the tank. MA therefore is to be inspected at every opportunity of tank/space entry. The above interpretation is to be contained in a section of the MA Manual.

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(cont)****SOLAS regulation II-1/3-6, paragraph 3.1****3 Safe access to cargo holds, cargo tanks, ballast tanks and other spaces**

3.1 Safe access\* to cargo holds, cofferdams, ballast tanks, cargo tanks and other spaces in the cargo area shall be direct from the open deck and such as to ensure their complete inspection. Safe access to double bottom spaces or to forward ballast tanks may be from a pump-room, deep cofferdam, pipe tunnel, cargo hold, double hull space or similar compartment not intended for the carriage of oil or hazardous cargoes.

\* Refer to the Revised recommendations for entering enclosed spaces aboard ships, adopted by the Organization by resolution A.1050(27).

**Interpretation**

Access to a double side skin space of bulk carriers may be either from a topside tank or double bottom tank or from both.

The wording "not intended for the carriage of oil or hazardous cargoes" applies only to "similar compartments", i.e. safe access can be through a pump-room, deep cofferdam, pipe tunnel, cargo hold or double hull space.

**Technical Background**

Unless used for other purposes, the double side skin space is to be designed as a part of a large U-shaped ballast tank and such space is to be accessed through the adjacent part of the tank, i.e. topside tank or double bottom/bilge hopper tank. Access to the double side skin space from the adjacent part rather than direct from the open deck is justified. Any such arrangement is to provide a directly routed, logical and safe access that facilitates easy evacuation of the space.

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## SOLAS regulation II-1/3-6, paragraph 3.2

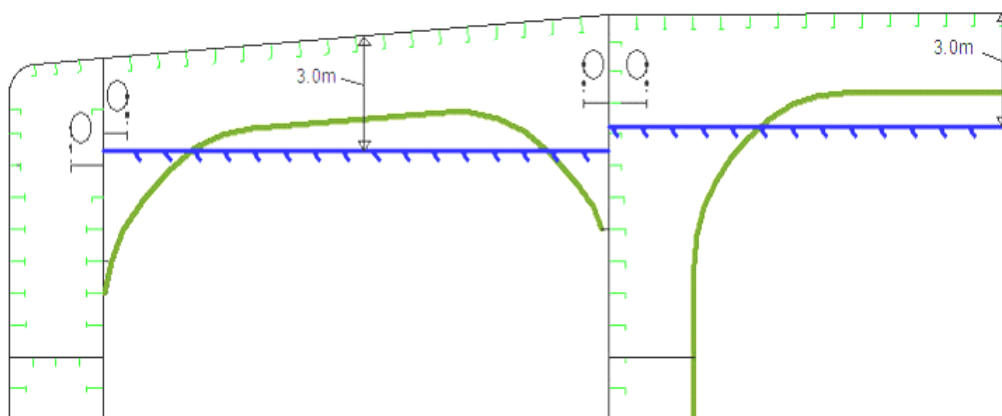
3.2 Tanks, and subdivisions of tanks, having a length of 35 m or more shall be fitted with at least two access hatchways and ladders, as far apart as practicable. Tanks less than 35 m in length shall be served by at least one access hatchway and ladder. When a tank is subdivided by one or more swash bulkheads or similar obstructions which do not allow ready means of access to the other parts of the tank, at least two hatchways and ladders shall be fitted.

### Interpretation

A cargo oil tank of less than 35 m length without a swash bulkhead requires only one access hatch.

Where rafting is indicated in the ship structures access manual as the means to gain ready access to the under deck structure, the term “*similar obstructions*” referred to in the regulation includes internal structures (e.g., webs >1.5m deep) which restrict the ability to raft (at the maximum water level needed for rafting of under deck structure) directly to the nearest access ladder and hatchway to deck. When rafts or boats alone, as an alternative means of access, are allowed under the conditions specified in the ESP Code, as amended, permanent means of access are to be provided to allow safe entry and exit. This means:

- access direct from the deck via a vertical ladder and small platform fitted approximately 2m below the deck in each bay; or
- access to deck from a longitudinal permanent platform having ladders to deck in each end of the tank. The platform shall, for the full length of the tank, be arranged in level with, or above, the maximum water level needed for rafting of under deck structure. For this purpose, the ullage corresponding to the maximum water level is to be assumed not more than 3m from the deck plate measured at the midspan of deck transverses and in the middle length of the tank. (See Figure below). A permanent means of access from the longitudinal permanent platform to the water level indicated above is to be fitted in each bay (e.g., permanent rungs on one of the deck webs inboard of the longitudinal permanent platform).



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(cont)****SOLAS regulation II-1/3-6, paragraph 4.1**

## 4 Ship structure access manual

4.1 A ship's means of access to carry out overall and close-up inspections and thickness measurements shall be described in a Ship structure access manual approved by the Administration, an updated copy of which shall be kept on board. The Ship structure access manual shall include the following for each space:

- .1 plans showing the means of access to the space, with appropriate technical specifications and dimensions;
- .2 plans showing the means of access within each space to enable an overall inspection to be carried out, with appropriate technical specifications and dimensions. The plans shall indicate from where each area in the space can be inspected;
- .3 plans showing the means of access within the space to enable close-up inspections to be carried out, with appropriate technical specifications and dimensions. The plans shall indicate the positions of critical structural areas, whether the means of access is permanent or portable and from where each area can be inspected;
- .4 instructions for inspecting and maintaining the structural strength of all means of access and means of attachment, taking into account any corrosive atmosphere that may be within the space;
- .5 instructions for safety guidance when rafting is used for close-up inspections and thickness measurements;
- .6 instructions for the rigging and use of any portable means of access in a safe manner;
- .7 an inventory of all portable means of access; and
- .8 records of periodical inspections and maintenance of the ship's means of access.

**Interpretation**

The access manual is to address spaces listed in paragraph 3 of the regulation II-1/3-6.

As a minimum the English version is to be provided.

The ship structure access manual is to contain at least the following two parts:

Part 1: Plans, instructions and inventory required by paragraphs 4.1.1 to 4.1.7 of regulation II-1/3-6. This part is to be approved by the Administration or the organization recognised by the Administration.

Part 2: Form of record of inspections and maintenance, and change of inventory of portable equipment due to additions or replacement after construction. This part is to be approved for its form only at new building.

The following matters are to be addressed in the ship structure access manual:

1. The access manual is to clearly cover scope as specified in the regulations for use by crews, surveyors and port State control officers.



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2. Approval / re-approval procedure for the manual, i.e. any changes of the permanent, portable, movable or alternative means of access within the scope of the regulation and the Technical provisions are subject to review and approval by the Administration or by the organization recognised by the Administration.
3. Verification of MA is to be part of safety construction survey for continued effectiveness of the MA in that space which is subject to the statutory survey.
4. Inspection of MA by the crew and/or a competent inspector of the company as a part of regular inspection and maintenance (see interpretation for paragraph 2.3 of SOLAS regulation II-1/3-6).
5. Actions to be taken if MA is found unsafe to use.
6. In case of use of portable equipment plans showing the means of access within each space indicating from where and how each area in the space can be inspected.

Refer to IACS Recommendation No.90 "Ship Structural Access Manual"

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(cont)****SOLAS regulation II-1/3-6, paragraph 4.2**

4.2 For the purpose of this regulation “critical structural areas” are locations which have been identified from calculations to require monitoring or from the service history of similar or sister ships to be sensitive to cracking, buckling, deformation or corrosion which would impair the structural integrity of the ship.

**Interpretation**

- 1) Critical structural areas are to be identified by advanced calculation techniques for structural strength and fatigue performance, if available, and feed back from the service history and design development of similar or sister ships.
- 2) Reference is to be made to the following publications for critical structural areas, where applicable:
  - Oil tankers: Guidance Manual for Tanker Structures by TSCF;
  - Bulk carriers: Bulk Carriers Guidelines for Surveys, Assessment and Repair of Hull Structure by IACS;
  - Oil tankers and bulk carriers: the ESP Code, as amended.

**Technical Background**

These documents contain the relevant information for the present ship types. However identification of critical areas for new double hull tankers and double side skin bulk carriers of improved structural design is to be made by structural analysis at the design stage, this information is to be taken in to account to ensure appropriate access to all identified critical areas.

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(cont)****SOLAS regulation II-1/3-6, paragraph 5.1**

## 5 General technical specifications

5.1 For access through horizontal openings, hatches or manholes, the dimensions shall be sufficient to allow a person wearing a self-contained air-breathing apparatus and protective equipment to ascend or descend any ladder without obstruction and also provide a clear opening to facilitate the hoisting of an injured person from the bottom of the space. The minimum clear opening shall not be less than 600 mm x 600 mm. When access to a cargo hold is arranged through the cargo hatch, the top of the ladder shall be placed as close as possible to the hatch coaming. Access hatch coamings having a height greater than 900 mm shall also have steps on the outside in conjunction with the ladder.

**Interpretation**

The minimum clear opening of 600 mm x 600 mm may have corner radii up to 100 mm maximum. The clear opening is specified in MSC/Circ.686 to keep the opening fit for passage of personnel wearing a breathing apparatus. In such a case where as a consequence of structural analysis of a given design the stress is to be reduced around the opening, it is considered appropriate to take measures to reduce the stress such as making the opening larger with increased radii, e.g. 600 x 800 with 300 mm radii, in which a clear opening of 600 x 600 mm with corner radii up to 100mm maximum fits.

**Technical Background**

The interpretation is based upon the established Guidelines in MSC/Circ.686.

**Ref.**

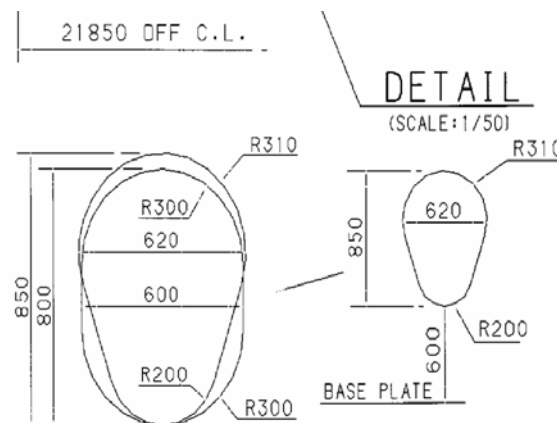
Paragraphs 9 of Annex of MSC/Circ.686.

**SOLAS regulation II-1/3-6, paragraph 5.2**

5.2 For access through vertical openings, or manholes, in swash bulkheads, floors, girders and web frames providing passage through the length and breadth of the space, the minimum opening shall be not less than 600 mm x 800 mm at a height of not more than 600 mm from the bottom shell plating unless gratings or other foot holds are provided.

**Interpretation**

1. The minimum clear opening of not less than 600 mm x 800 mm may also include an opening with corner radii of 300 mm. An opening of 600mm in height x 800mm in width may be accepted as access openings in vertical structures where it is not desirable to make large opening in the structural strength aspects, i.e. girders and floors in double bottom tanks.
2. Subject to verification of easy evacuation of injured person on a stretcher the vertical opening 850 mm x 620 mm with wider upper half than 600 mm, while the lower half may be less than 600 mm with the overall height not less than 850 mm is considered an acceptable alternative to the traditional opening of 600 mm x 800 mm with corner radii of 300 mm.



3. If a vertical opening is at a height of more than 600 mm steps and handgrips are to be provided. In such arrangements it is to be demonstrated that an injured person can be easily evacuated.

**Technical Background**

The interpretation is based upon the established Guidelines in MSC/Circ.686 and an innovative design is considered for easy access by humans through the opening.

**Ref.**

Paragraphs 11 of Annex of MSC/Circ.686.

**Technical Provision, resolution MSC.158(78), paragraph 1.3****1. Preamble**

1.3 In order to address this issue, the Organization has developed these Technical provisions for means of access for inspections (hereinafter called the "Technical provisions"), intended to facilitate close-up inspections and thickness measurements of the ship's structure referred to in SOLAS regulation II-1/3-6 on Access to and within spaces in, and forward of, the cargo area of oil tankers and bulk carriers. The Technical provisions do not apply to the cargo tanks of combined chemical/oil tankers complying with the provisions of the IBC Code.

**Interpretation**

A "combined chemical/oil tankers complying with the provisions of the IBC Code" is a tanker that holds both a valid IOPP certificate as tanker and a valid certificate of fitness for the carriage of dangerous chemicals in bulk. i.e. a tanker that is certified to carry both oil cargoes under MARPOL Annex I and Chemical cargoes in chapter 17 of the IBC Code either as full or part cargoes.

The Technical provisions are to be applied to ballast tanks of combined chemical/oil tankers complying with the provisions of the IBC Code.

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(cont)****Technical Provision, resolution MSC.158(78), paragraph 1.4****1. Preamble**

1.4 Permanent means of access which are designed to be integral parts of the structure itself are preferred and Administrations may allow reasonable deviations to facilitate such designs.

**Interpretation**

In the context of the above requirement, the deviation shall be applied only to distances between integrated PMA that are the subject of paragraph 2.1.2 of Table 1.

Deviations shall not be applied to the distances governing the installation of underdeck longitudinal walkways and dimensions that determine whether permanent access are required or not, such as height of the spaces and height to elements of the structure (e.g. cross-ties).

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(cont)****Technical Provision, resolution MSC.158(78), paragraph 3.1**

3.1 Structural members subject to the close-up inspections and thickness measurements of the ship's structure referred to in SOLAS regulation II-1/ 3-6, except those in double bottom spaces, shall be provided with a permanent means of access to the extent as specified in table 1 and table 2, as applicable. For oil tankers and wing ballast tanks of ore carriers, approved alternative methods may be used in combination with the fitted permanent means of access, provided that the structure allows for its safe and effective use.

**Interpretation**

The permanent means of access to a space can be credited for the permanent means of access for inspection.

**Technical Background**

The Technical provisions specify means of access to a space and to hull structure for carrying out overall and close up surveys and inspections. Requirements of MA to hull structure may not always be suitable for access to a space. However if the MA for access to a space can also be used for the intended surveys and inspections such MA can be credited for the MA for use for surveys and inspections.

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## Technical Provision, resolution MSC.158(78), paragraph 3.3

3.3 Elevated passageways forming sections of a permanent means of access, where fitted, shall have a minimum clear width of 600 mm, except for going around vertical webs where the minimum clear width may be reduced to 450 mm, and have guard rails over the open side of their entire length. Sloping structure providing part of the access shall be of a non-skid construction. Guard rails shall be 1,000 mm in height and consist of a rail and intermediate bar 500 mm in height and of substantial construction. Stanchions shall be not more than 3 m apart.

### Interpretation

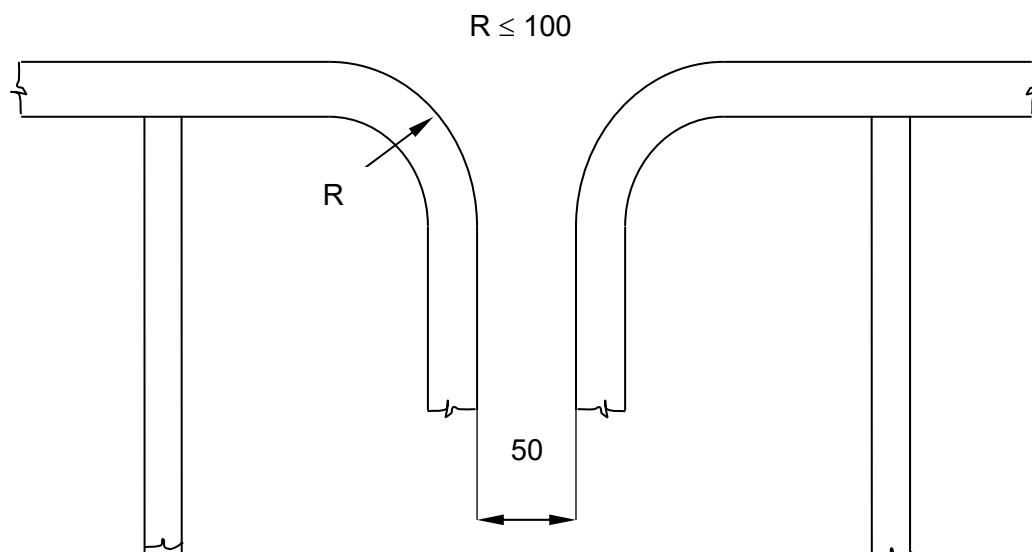
1. Sloping structures are structures that are sloped by 5 or more degrees from horizontal plane when a ship is in upright position at even-keel.
2. Guard rails are to be fitted on the open side and should be at least 1,000 mm in height. For stand alone passageways guard rails are to be fitted on both sides of these structures. Guardrail stanchions are to be attached to the PMA. The distance between the passageway and the intermediate bar and the distance between intermediate bar and the top rail shall not be more than 500 mm.
3. Discontinuous top handrails are allowed, provided the gap does not exceed 50 mm.

The same maximum gap is to be considered between the top handrail and other structural members (i.e. bulkhead, web frame, etc.).

The maximum distance between the adjacent stanchions across the handrail gaps is to be 350 mm where the top and mid handrails are not connected together and 550 mm when they are connected together.

The maximum distance between the stanchion and other structural members is not to exceed 200 mm where the top and mid handrails are not connected together and 300 mm when they are connected together.

When the top and mid handrails are connected by a bent rail, the outside radius of the bent part is not to exceed 100 mm (see Figure below).





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4. Non-skid construction is such that the surface on which personnel walks provides sufficient friction to the sole of boots even if the surface is wet and covered with thin sediment.
5. "Substantial construction" is taken to refer to the as-designed strength as well as the residual strength during the service life of the vessel. Durability of passageways together with guard rails is to be ensured by the initial corrosion protection and inspection and maintenance during services.
6. For guard rails, use of alternative materials such as GRP is to be subject to compatibility with the liquid carried in the tank. Non-fire resistant materials are not to be used for means of access to a space with a view to securing an escape route at a high temperature.
7. Requirements for resting platforms placed between ladders are equivalent to those applicable to elevated passageways.

**Ref.**

Paragraph 10 of Annex to MSC/Circ.686

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(cont)****Technical Provision, resolution MSC.158(78), paragraph 3.4**

3.4 Access to permanent means of access and vertical openings from the ship's bottom shall be provided by means of easily accessible passageways, ladders or treads. Treads shall be provided with lateral support for the foot. Where the rungs of ladders are fitted against a vertical surface, the distance from the centre of the rungs to the surface shall be at least 150 mm. Where vertical manholes are fitted higher than 600 mm above the walking level, access shall be facilitated by means of treads and hand grips with platform landings on both sides.

**Interpretation**

Where the vertical manhole is at a height of more than 600 mm above the walking level, it shall be demonstrated that an injured person can be easily evacuated.

**Technical Provision, resolution MSC.158(78), paragraph 3.5**

3.5 Permanent inclined ladders shall be inclined at an angle of less than 70°. There shall be no obstructions within 750 mm of the face of the inclined ladder, except that in way of an opening this clearance may be reduced to 600 mm. Resting platforms of adequate dimensions shall be provided normally at a maximum of 6 m vertical height. Ladders and handrails shall be constructed of steel or equivalent material of adequate strength and stiffness and securely attached to the structure by stays. The method of support and length of stay shall be such that vibration is reduced to a practical minimum. In cargo holds, ladders shall be designed and arranged so that cargo handling difficulties are not increased and the risk of damage from cargo handling gear is minimized.

***MA for access to ballast tanks, cargo tanks and spaces other than fore peak tanks:*****For oil tankers:**

1. Tanks and subdivisions of tanks having a length of 35 m or more with two access hatchways:

First access hatchway: Inclined ladder or ladders are to be used.

Second access hatchway:

- i. A vertical ladder may be used. In such a case where the vertical distance is more than 6 m, vertical ladders are to comprise one or more ladder linking platforms spaced not more than 6 m apart vertically and displaced to one side of the ladder.

The uppermost section of the vertical ladder, measured clear of the overhead obstructions in way of the tank entrance, is not to be less than 2.5 m but not exceed 3.0 m and is to comprise a ladder linking platform which is to be displaced to one side of a vertical ladder. However, the vertical distance of the upper most section of the vertical ladder may be reduced to 1.6 m, measured clear of the overhead obstructions in way of the tank entrance, if the ladder lands on a longitudinal or athwartship permanent means of access fitted within that range. Adjacent sections of the ladder are to be laterally offset from each other by at least the width of the ladder (see paragraph 20 of MSC/Circ.686 and refer to the interpretation of Technical Provision, resolution MSC.158(78), paragraph 3.13.2 and paragraph 3.13.6); or

- ii. Where an inclined ladder or combination of ladders is used for access to the space, the uppermost section of the ladder, measured clear of the overhead obstructions in way of the tank entrance, is to be vertical for not less than 2.5 m but not exceed 3.0m and is to comprise a landing platform continuing with an inclined ladder. However, the vertical distance of the upper most section of the vertical ladder may be reduced to 1.6 m, measured clear of the overhead obstructions in way of the tank entrance, if the ladder lands on a longitudinal or athwartship permanent means of access fitted within that range. The flights of the inclined ladders are normally to be not more than 6 m in vertical height. The lowermost section of the ladders may be vertical for the vertical distance not exceeding 2.5 m.

2. Tanks less than 35 m in length and served by one access hatchway an inclined ladder or combination of ladders are to be used to the space as specified in 1.ii above.
3. In spaces of less than 2.5 m width the access to the space may be by means of vertical ladders that comprises one or more ladder linking platforms spaced not more than 6 m apart vertically and displaced to one side of the ladder. The uppermost section of the vertical ladder, measured clear of the overhead obstructions in way of the tank

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entrance, is not to be less than 2.5 m but not exceed 3.0 m and is to comprise a ladder linking platform which is to be displaced to one side of a vertical ladder. However, the vertical distance of the upper most section of the vertical ladder may be reduced to 1.6 m, measured clear of the overhead obstructions in way of the tank entrance, if the ladder lands on a longitudinal or athwartship permanent means of access fitted within that range. Adjacent sections of the ladder are to be laterally offset from each other by at least the width of the ladder (see paragraph 20 of MSC/Circ.686 and refer to the interpretation of Technical Provision, resolution MSC.158(78), paragraph 3.13.2 and paragraph 3.13.6).

4. Access from deck to a double bottom space may be by means of vertical ladders through a trunk. The vertical distance from deck to a resting platform, between resting platforms or a resting platform and the tank bottom is not to be more than 6 m unless otherwise approved by the Administration.

***MA for inspection of the vertical structure of oil tankers:***

Vertical ladders provided for means of access to the space may be used for access for inspection of the vertical structure.

Unless stated otherwise in Table 1 of TP, vertical ladders that are fitted on vertical structures for inspection are to comprise one or more ladder linking platforms spaced not more than 6 m apart vertically and displace to one side of the ladder. Adjacent sections of ladder are to be laterally offset from each other by at least the width of the ladder (paragraph 20 of MSC/Circ.686 and refer to the interpretation of Technical Provision, resolution MSC.158(78), paragraph 3.13.2 and paragraph 3.13.6).

***Obstruction distances***

The minimum distance between the inclined ladder face and obstructions, i.e. 750 mm and, in way of openings, 600 mm specified in TP 3.5 is to be measured perpendicular to the face of the ladder.

**Technical Background**

It is a common practice to use a vertical ladder from deck to the first landing to clear overhead obstructions before continuing to an inclined ladder or a vertical ladder displaced to one side of the first vertical ladder.

**Ref.**

For vertical ladders: Paragraph 20 of the annex to MSC/Circ.686.

**Technical Provision, resolution MSC.158(78), paragraph 3.6**

3.6 The width of inclined ladders between stringers shall not be less than 400 mm. The treads shall be equally spaced at a distance apart, measured vertically, of between 200 mm and 300 mm. When steel is used, the treads shall be formed of two square bars of not less than 22 mm by 22 mm in section, fitted to form a horizontal step with the edges pointing upward. The treads shall be carried through the side stringers and attached thereto by double continuous welding. All inclined ladders shall be provided with handrails of substantial construction on both sides fitted at a convenient distance above the treads.

**Interpretation**

1. Vertical height of handrails is not to be less than 890 mm from the center of the step and two course handrails need only be provided where the gap between stringer and top handrail is greater than 500 mm.
2. The requirement of two square bars for treads specified in TP, paragraph 3.6, is based upon the specification of construction of ladders in paragraph 3(e) of Annex 1 to resolution A.272(VIII), which addresses inclined ladders. TP, paragraph 3.4, allows for single rungs fitted to vertical surfaces, which is considered for a safe grip. For vertical ladders, when steel is used, the rungs are to be formed of single square bars of not less than 22 mm by 22 mm for the sake of safe grip.
3. The width of inclined ladders for access to a cargo hold is to be at least 450 mm to comply with the Australian AMSA Marine Orders Part 32, Appendix 17.
4. The width of inclined ladders other than an access to a cargo hold is to be not less than 400 mm.
5. The minimum width of vertical ladders is to be 350 mm and the vertical distance between the rungs is to be equal and is to be between 250 mm and 350 mm.
6. A minimum climbing clearance in width is to be 600 mm other than the ladders placed between the hold frames.
7. The vertical ladders are to be secured at intervals not exceeding 2.5 m apart to prevent vibration.

**Technical Background**

- TP, paragraph 3.6, is a continuation of TP, paragraph 3.5, which addresses inclined ladders. Interpretations for vertical ladders are needed based upon the current standards of IMO, AMSA or the industry.
- Interpretations 2 and 5 address vertical ladders based upon the current standards.
- Double square bars for treads become too large for a grip for vertical ladders and single rungs facilitate a safe grip.
- Interpretation 7 is introduced consistently with the requirement and the interpretation of TP, paragraph 3.4.

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191  
(cont)****Ref.**

- Annex 1 to resolution A.272(VIII).
- Australian AMSA Marine Orders Part 32, Appendix 17.
- ILO Code of Practice “Safety and Health in Dockwork” – Section 3.6 Access to Ship’s Holds.

**SC  
191  
(cont)****Technical Provision, resolution MSC.158(78), paragraph 3.9.6**

3.9.6 Portable ladders more than 5 m long may only be utilized if fitted with a mechanical device to secure the upper end of the ladder.

**Interpretation**

A mechanical device such as hooks for securing at the upper end of a ladder is to be considered as an appropriate securing device if a movement fore/aft and sideways can be prevented at the upper end of the ladder.

**Technical Background**

Innovative design is to be accepted if it fits the functional requirement with due consideration for safe use.

**SC  
191  
(cont)****Technical Provision, resolution MSC.158(78), paragraph 3.10 and 3.11**

3.10 For access through horizontal openings, hatches or manholes, the minimum clear opening shall not be less than 600 mm x 600 mm. When access to a cargo hold is arranged through the cargo hatch, the top of the ladder shall be placed as close as possible to the hatch coaming. Access hatch coamings having a height greater than 900 mm shall also have steps on the outside in conjunction with the ladder.

3.11 For access through vertical openings, or manholes, in swash bulkheads, floors, girders and web frames providing passage through the length and breadth of the space, the minimum opening shall be not less than 600 mm x 800 mm at a height of not more than 600 mm from the passage unless gratings or other foot holds are provided.

**Interpretation**

See interpretation for paragraphs 5.1 and 5.2 of SOLAS regulation II-1/3-6.



**SC  
191  
(cont)****Technical Provision, resolution MSC.158(78), paragraph 3.13.1**

3.13. For bulk carriers, access ladders to a cargo hold shall be:

.1 where the vertical distance between the upper surface of adjacent decks or between deck and the bottom of the cargo space is not more than 6 m, either a vertical ladder or an inclined ladder; and

**Interpretation**

Either a vertical or an inclined ladder or a combination of them may be used for access to a cargo hold where the vertical distance is 6 m or less from the deck to the bottom of the cargo hold.

# SC 191 (cont)

## Technical Provision, resolution MSC.158(78), paragraph 3.13.2 and paragraph 3.13.6

3.13. For bulk carriers, access ladders to a cargo hold shall be:

.1 ....omissis.....

.2 Where the vertical distance between the upper surface of adjacent decks or between deck and the bottom of the cargo space is more than 6 m, an inclined ladder or series of inclined ladders at one end of the cargo hold, except the uppermost 2.5 m of a cargo space measured clear of overhead obstructions and the lowest 6 m may have vertical ladders, provided that the vertical extent of the inclined ladder or ladders connecting the vertical ladders is not less than 2.5 m.

The second means of access at the other end of the cargo hold may be formed of a series of staggered vertical ladders, which should comprise of one or more ladder linking platforms spaced not more than 6 m apart vertically and displaced to one side of the ladder. Adjacent sections of ladder should be laterally offset from each other by at least the width of the ladder. The uppermost entrance section of the ladder directly exposed to a cargo hold should be vertical for a distance of 2.5 m measured clear of overhead obstructions and connected to a ladder-linking platform.

.3 ....omissis.....

.4 ....omissis.....

.5 ....omissis.....

.6 In double-side skin spaces of less than 2.5 m width, the access to the space may be by means of vertical ladders that comprise of one or more ladder linking platforms spaced not more than 6 m apart vertically and displaced to one side of the ladder. Adjacent sections of ladder should be laterally offset from each other by at least the width of the ladder.

.7 ....omissis.....

### Interpretation

Adjacent sections of vertical ladder need to be installed so that the following provisions are complied with:

- the minimum "lateral offset" between two adjacent sections of vertical ladder, is the distance between the sections, upper and lower, so that the adjacent stringers are spaced at least 200 mm apart, measured from half thickness of each stringer.
- adjacent sections of vertical ladder shall be installed so that the upper end of the lower section is vertically overlapped, in respect to the lower end of the upper section, to a height of 1500 mm in order to permit a safe transfer between ladders.
- no section of the access ladder shall be terminated directly or partly above an access opening.

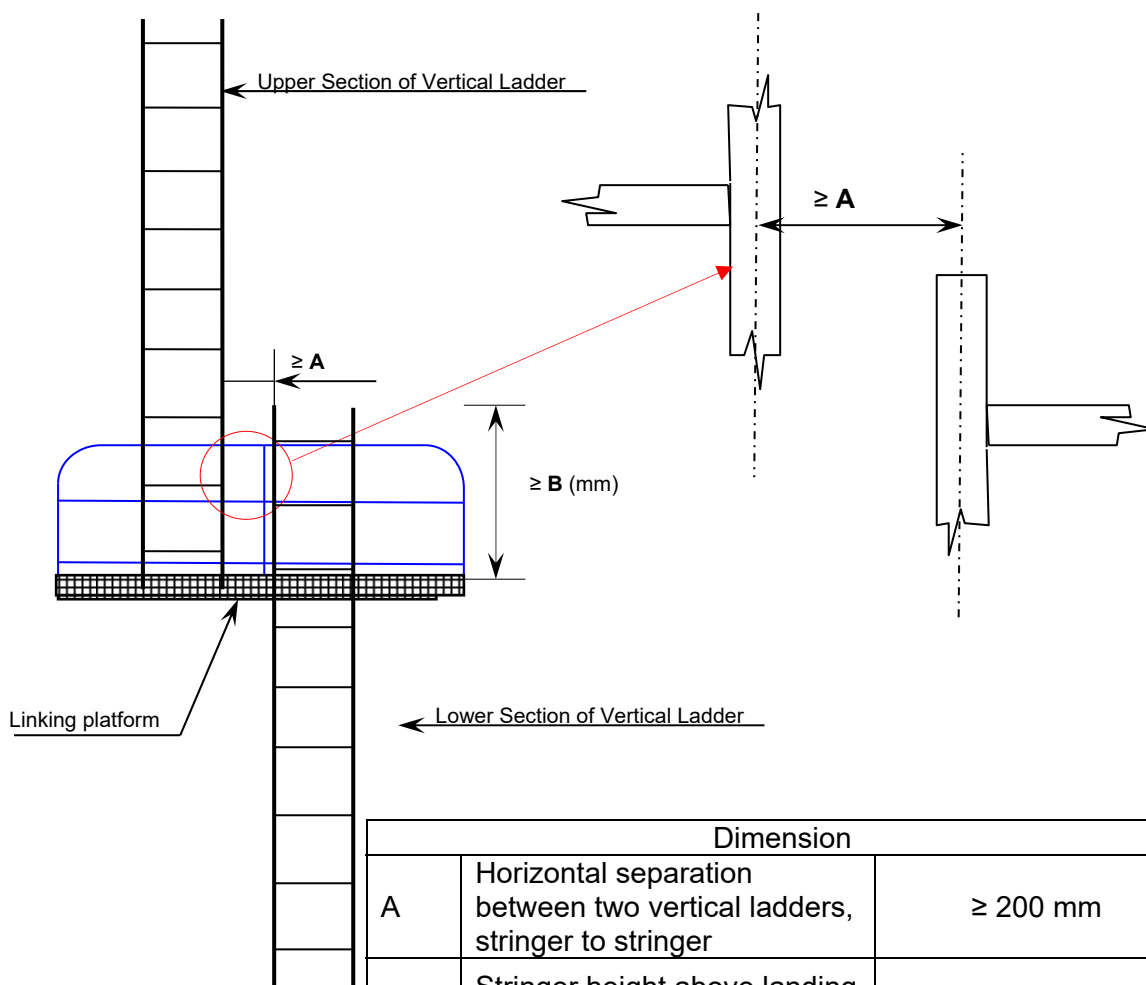
### Technical Background

The aims of the above are to:

**SC  
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(cont)**

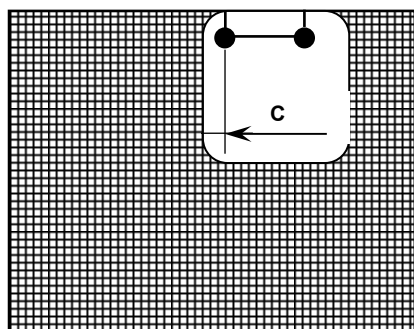
- a. Reduce the risk of accidents due to tiredness by providing a rest platform at appropriate intervals.
- b. Reduce the risk of collateral injury from falling or dropping items of equipment by preventing the lateral overlap of two ladders.

Figure "A"  
Vertical Ladder – Ladder through the linking platform



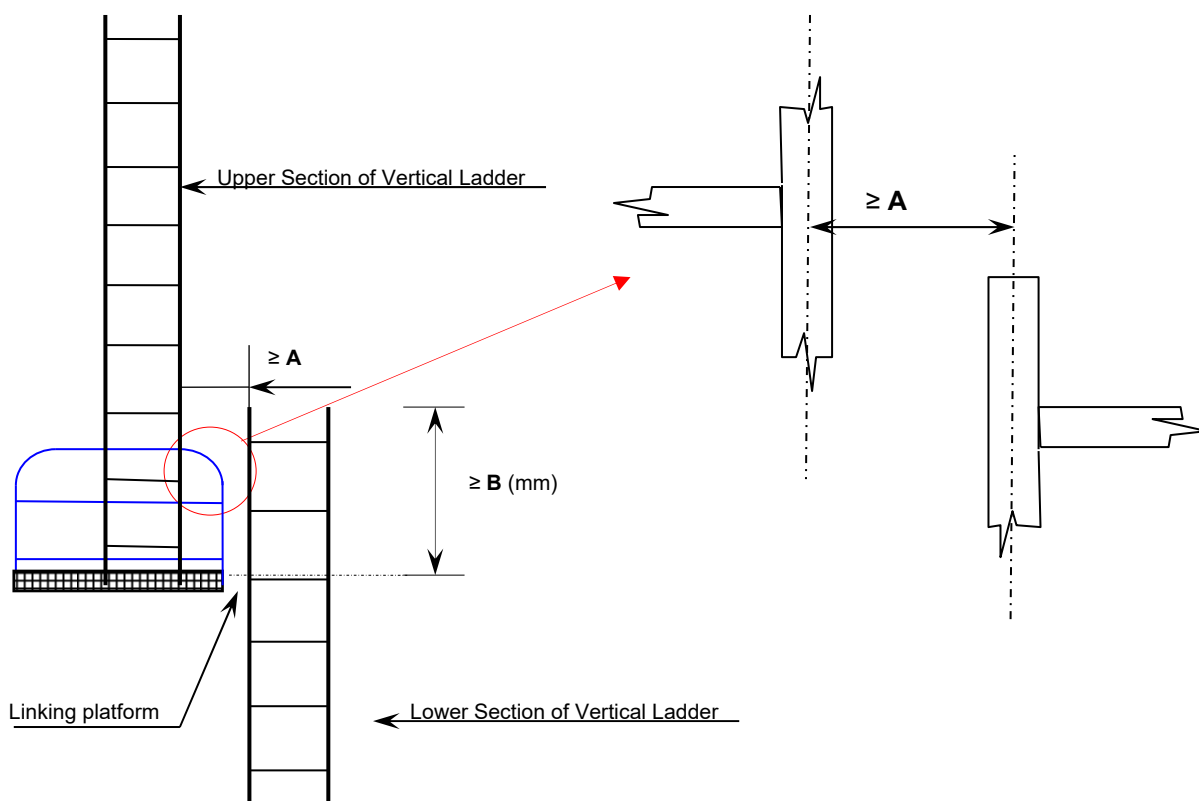
Dimension		
A	Horizontal separation between two vertical ladders, stringer to stringer	$\geq 200$ mm
B	Stringer height above landing or intermediate platform	$\geq 1500^*$ mm
C	Horizontal separation between ladder and platform	$100 \text{ mm} \leq C < 300$ mm

\*Note: the minimum height of the handrail of resting platform is of 1000 mm (Technical Provision, resolution MSC.158(78), paragraph 3.3)



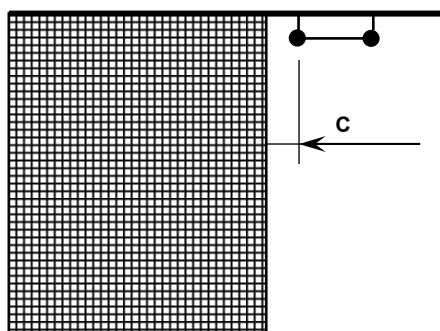
SC  
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(cont)

Figure "B"  
Vertical Ladder – Side mount



Dimension		
A	Horizontal separation between two vertical ladders, stringer to stringer	$\geq 200$ mm
B	Stringer height above landing or intermediate platform	$\geq 1500^*$ mm
C	Horizontal separation between ladder and platform	$100 \text{ mm} \leq C < 300 \text{ mm}$

\*Note: the minimum height of the handrail of resting platform is of 1000 mm (Technical Provision, resolution MSC.158(78), paragraph 3.3)



**SC  
191  
(cont)****Technical Provision, resolution MSC.158(78), paragraph 3.14**

3.14 The uppermost entrance section from deck of the vertical ladder providing access to a tank should be vertical for a distance of 2.5 m measured clear of overhead obstructions and comprise a ladder linking platform, displaced to one side of a vertical ladder. The vertical ladder can be between 1.6 m and 3 m below deck structure if it lands on a longitudinal or athwartship permanent means of access fitted within that range.

**Interpretation**

Deck is defined as “weather deck”.

**Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 1.1****1 Water ballast tanks, except those specified in the right column, and cargo oil tanks****Access to overhead structure**

1.1 For tanks of which the height is 6 m and over containing internal structures, permanent means of access shall be provided in accordance with .1 to .6:

**Interpretation**

1. Sub-paragraphs .1, .2 and .3 define access to underdeck structure, access to the uppermost sections of transverse webs and connection between these structures.
2. Sub-paragraphs .4, .5 and .6 define access to vertical structures only and are linked to the presence of transverse webs on longitudinal bulkheads.
3. If there are no underdeck structures (deck longitudinals and deck transverses) but there are vertical structures in the cargo tank supporting transverse and longitudinal bulkheads, access in accordance with sub-paragraphs from .1 through to .6 is to be provided for inspection of the upper parts of vertical structure on transverse and longitudinal bulkheads.
4. If there is no structure in the cargo tank, section 1.1 of Table 1 is not to be applied.
5. Section 1 of Table 1 is also to be applied to void spaces in cargo area, comparable in volume to spaces covered by the regulation II-1/3-6, except those spaces covered by Section 2.
6. The vertical distance below the overhead structure is to be measured from the underside of the main deck plating to the top of the platform of the means of access at a given location.
7. The height of the tank is to be measured at each tank. For a tank the height of which varies at different bays, item 1.1 is to be applied to such bays of a tank that have height 6 m and over.

**Technical Background**

Interpretation 7: If the height of the tank is increasing along the length of a ship the permanent means of access is to be provided locally where the height is above 6 m.

**Ref.**

Paragraph 10 of the annex to MSC/Circ.686.

**SC  
191  
(cont)****Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 1.1.2**

1.1.2 at least one continuous longitudinal permanent means of access at each side of the tank. One of these accesses shall be at a minimum of 1.6 m to a maximum of 6 m below the deck head and the other shall be at a minimum of 1.6 m to a maximum of 3 m below the deck head;

**Interpretation**

There is need to provide continuous longitudinal permanent means of access when the deck longitudinals and deck transverses are fitted on deck but supporting brackets are fitted under the deck.



**Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 1.1.3**

1.1.3 access between the arrangements specified in .1 and .2 and from the main deck to either .1 or .2.

**Interpretation**

Means of access to tanks may be used for access to the permanent means of access for inspection.

**Technical Background**

As a matter of principle, in such a case where the means of access can be utilised for the purpose of accessing structural members for inspection there is no need of duplicated installation of the MA.

**Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 1.1.4**

1.1.4 continuous longitudinal permanent means of access which are integrated in the structural member on the stiffened surface of a longitudinal bulkhead, in alignment, where possible, with horizontal girders of transverse bulkheads are to be provided for access to the transverse webs unless permanent fittings are installed at the uppermost platform for use of alternative means as defined in paragraph 3.9 of the Technical provisions for inspection at intermediate heights;

**Interpretation**

The permanent fittings required to serve alternative means of access such as wire lift platform, that are to be used by crew and surveyors for inspection shall provide at least an equal level of safety as the permanent means of access stated by the same paragraph. These means of access shall be carried on board the ship and be readily available for use without filling of water in the tank.

Therefore, rafting is not to be acceptable under this provision.

Alternative means of access are to be part of Access Manual which is to be approved on behalf of the flag State.

For water ballast tanks of 5 m or more in width, such as on an ore carrier, side shell plating shall be considered in the same way as "longitudinal bulkhead".

**Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 2.1****2 Water ballast wing tanks of less than 5 m width forming double side spaces and their bilge hopper sections*****Access to the underdeck structure***

2.1 For double side spaces above the upper knuckle point of the bilge hopper sections, permanent means of access are to be provided in accordance with .1 and .2:

**Interpretation**

Section 2 of Table 1 is also to be applied to wing tanks designed as void spaces.

Paragraph 2.1.1 represents requirements for access to underdeck structures, while paragraph 2.1.2 is a requirement for access for survey and inspection of vertical structures on longitudinal bulkheads (transverse webs).

**Technical Background**

Regulation II-1/3-6.2.1 requires each space to be provided with means of access. Though void spaces are not addressed in the technical provisions contained in resolution MSC.158(78) it is arguable whether MA is not required in void spaces. MA or portable means of access are necessary arrangement to facilitate inspection of the structural condition of the space and the boundary structure. Therefore the requirements of Section 2 of Table 1 is to be applied to double hull spaces even designed as void spaces.

**Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 2.1.1****2. Wing water ballast tanks less than 5 m width forming double side spaces and their bilge hopper sections*****Access to the underdeck structure***

2.1.1 Where the vertical distance between horizontal uppermost stringer and deck head is 6 m or more, one continuous permanent means of access shall be provided for the full length of the tank with a means to allow passing through transverse webs installed a minimum of 1.6 m to a maximum of 3 m below the deck head with a vertical access ladder at each end of tank;

**Interpretation**

1. For a tank, the vertical distance between horizontal upper stringer and deck head of which varies at different sections, item 2.1.1 is to be applied to such sections that falls under the criteria.
2. The continuous permanent means of access may be a wide longitudinal, which provides access to critical details on the opposite side by means of platforms as necessary on web frames. In case the vertical opening of the web frame is located in way of the open part between the wide longitudinal and the longitudinal on the opposite side, platforms shall be provided on both sides of the web frames to allow safe passage through the web frame.
3. Where two access hatches are required by SOLAS regulation II-1/3-6.3.2, access ladders at each end of the tank are to lead to the deck.

**Technical Background**

Interpretation 1: The interpretation of varied tank height in item 1 of Table 1 is applied to the vertical distance between horizontal upper stringer and deck head for consistency.

**Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 2.1.2**

2.1.2 continuous longitudinal permanent means of access, which are integrated in the structure, at a vertical distance not exceeding 6 m apart; and

**Interpretation**

The continuous permanent means of access may be a wide longitudinal, which provides access to critical details on the opposite side by means of platforms as necessary on webframes. In case the vertical opening of the web is located in way of the open part between the wide longitudinal and the longitudinal on the opposite side, platforms shall be provided on both sides of the web to allow safe passage through the web.

A “reasonable deviation”, as noted in TP, paragraph 1.4, of not more than 10% may be applied where the permanent means of access is integral with the structure itself.

**Table 1 – Means of access for oil tankers, resolution MSC.158(78), paragraph 2.2**

2.2 For bilge hopper sections of which the vertical distance from the tank bottom to the upper knuckle point is 6 m and over, one longitudinal permanent means of access shall be provided for the full length of the tank. It shall be accessible by vertical permanent means of access at both ends of the tank.

**Interpretation**

1. Permanent means of access between the longitudinal continuous permanent means of access and the bottom of the space is to be provided.
2. The height of a bilge hopper tank located outside of the parallel part of vessel is to be taken as the maximum of the clear vertical distance measured from the bottom plating to the hopper plating of the tank.
3. The foremost and aftmost bilge hopper ballast tanks with raised bottom, of which the height is 6 m and over, a combination of transverse and vertical MA for access to the upper knuckle point for each transverse web is to be accepted in place of the longitudinal permanent means of access.

**Technical Background**

Interpretation 2: The bilge hopper tanks at fore and aft of cargo area narrow due to raised bottom plating and the actual vertical distance from the bottom of the tank to hopper plating of the tank is more appropriate to judge if a portable means of access could be utilized for the purpose.

Interpretation 3: in the foremost or aftmost bilge hopper tanks where the vertical distance is 6 m or over but installation of longitudinal permanent means of access is not practicable permanent means of access of combination of transverse and vertical ladders provides an alternative means of access to the upper knuckle point.

**Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 1.1****1 Cargo holds*****Access to underdeck structure***

1.1 Permanent means of access shall be fitted to provide access to the overhead structure at both sides of the cross deck and in the vicinity of the centreline. Each means of access shall be accessible from the cargo hold access or directly from the main deck and installed at a minimum of 1.6 m to a maximum of 3 m below the deck.

**Interpretation**

1. Means of access shall be provided to the crossdeck structures of the foremost and aftermost part of the each cargo hold.
2. Interconnected means of access under the cross deck for access to three locations at both sides and in the vicinity of the centerline is to be acceptable as the three means of access.
3. Permanent means of access fitted at three separate locations accessible independently, one at each side and one in the vicinity of the centerline is to be acceptable.
4. Special attention is to be paid to the structural strength where any access opening is provided in the main deck or cross deck.
5. The requirements for bulk carrier cross deck structure is also to be considered applicable to ore carriers.

**Technical Background**

Pragmatic arrangements of the MA are provided.

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191  
(cont)****Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 1.3**

1.3 Access to the permanent means of access to overhead structure of the cross deck may also be via the upper stool.

**Interpretation**

Particular attention is to be paid to preserve the structural strength in way of access opening provided in the main deck or cross deck.



**SC  
191  
(cont)****Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 1.4**

1.4 Ships having transverse bulkheads with full upper stools with access from the main deck which allows monitoring of all framing and plates from inside, do not require permanent means of access of the cross deck.

**Interpretation**

“Full upper stools” are understood to be stools with a full extension between top side tanks and between hatch end beams.

**Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 1.5**

1.5 Alternatively, movable means of access may be utilized for access to the overhead structure of cross deck if its vertical distance is 17 m or less above the tank top.

**Interpretation**

1. The movable means of access to the underdeck structure of cross deck need not necessarily be carried on board the vessel. It is sufficient if it is made available when needed.
2. The requirements for bulk carrier cross deck structure is also to be considered applicable to ore carriers.

**Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 1.6*****Access to vertical structures***

1.6 Permanent means of vertical access shall be provided in all cargo holds and built into the structure to allow for an inspection of a minimum of 25 % of the total number of hold frames port and starboard equally distributed throughout the hold including at each end in way of transverse bulkheads. But in no circumstance shall this arrangement be less than 3 permanent means of vertical access fitted to each side (fore and aft ends of hold and mid-span). Permanent means of vertical access fitted between two adjacent hold frames is counted for an access for the inspection of both hold frames. A means of portable access may be used to gain access over the sloping plating of lower hopper ballast tanks.

**Interpretation**

The maximum vertical distance of the rungs of vertical ladders for access to hold frames is to be 350 mm.

If safety harness is to be used, means are to be provided for connecting the safety harness in suitable places in a practical way.

**Technical Background**

The maximum vertical distance of the rungs of 350 mm is applied with a view to reducing trapping cargoes.

**SC  
191  
(cont)****Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 1.7**

1.7 In addition, portable or movable means of access shall be utilized for access to the remaining hold frames up to their upper brackets and transverse bulkheads.

**Interpretation**

Portable, movable or alternative means of access also is to be applied to corrugated bulkheads.

**SC  
191  
(cont)****Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 1.8**

1.8 Portable or movable means of access may be utilized for access to hold frames up to their upper bracket in place of the permanent means required in 1.6. These means of access shall be carried on board the ship and readily available for use.

**Interpretation**

Readily available means;

Able to be transported to location in cargo hold and safely erected by ship's staff.

**SC  
191  
(cont)****Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 2.3**

2.3 Three permanent means of access, fitted at the end bay and middle bay of each tank, shall be provided spanning from tank base up to the intersection of the sloping plate with the hatch side girder. The existing longitudinal structure may be used as part of this means of access.

**Interpretation**

If the longitudinal structures on the sloping plate are fitted outside of the tank a means of access is to be provided.

**SC  
191  
(cont)****Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 2.5*****Bilge hopper tanks***

2.5 For each bilge hopper tank of which the height is 6 m and over, one longitudinal continuous permanent means of access shall be provided along the side shell webs and installed at a minimum of 1.2 m below the top of the clear opening of the web ring with a vertical access ladder in the vicinity of each access to the tank.

**Interpretation**

1. The height of a bilge hopper tank located outside of the parallel part of vessel is to be taken as the maximum of the clear vertical height measured from the bottom plating to the hopper plating of the tank.
2. It is to be demonstrated that portable means for inspection can be deployed and made readily available in the areas where needed.

**Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 2.5.2*****Bilge hopper tanks***

2.5.2 Alternatively, the longitudinal continuous permanent means of access can be located through the upper web plating above the clear opening of the web ring, at a minimum of 1.6 m below the deck head, when this arrangement facilitates more suitable inspection of identified structurally critical areas. An enlarged longitudinal frame can be used for the purpose of the walkway.

**Interpretation**

A wide longitudinal frame of at least 600 mm clear width may be used for the purpose of the longitudinal continuous permanent means of access. The foremost and aftermost bilge hopper ballast tanks with raised bottom, of which the height is 6 m and over, a combination of transverse and vertical MA for access to the sloping plate of hopper tank connection with side shell plating for each transverse web can be accepted in place of the longitudinal permanent means of access.



**SC  
191  
(cont)****Table 2 – Means of access for bulk carriers, resolution MSC.158(78), paragraph 2.6**

2.6 If no access holes are provided through the transverse ring webs within 600 mm of the tank base and the web frame rings have a web height greater than 1 m in way of side shell and sloping plating, then step rungs/grab rails shall be provided to allow safe access over each transverse web frame ring.

**Interpretation**

The height of web frame rings is to be measured in way of side shell and tank base.

**Technical Background**

In the bilge hopper tank the sloping plating is above the opening, while the movement of the surveyor is along the bottom of the tank. Therefore the measurement of 1 m is to be taken from the bottom of the tank.

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