

Isle of Man Ship Registry Technical Advisory Notice

Cargo Hazards - Appreciate Them!

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This Technical Advisory Notice is targeted at “dry cargo” operators and ship’s crews, such that “dry cargo” hazards may be systematically considered prior to loading the cargo.

Despite intensive efforts by all sectors of the industry, accidents resulting in death or serious injury in cargo and adjacent spaces of ships carrying dry cargoes continue to occur. A need has been identified for a more systematic and structured hazard identification/risk assessment process to be put in place for ships carrying these cargoes to allow dry cargo hazards to be better understood by both ship’s operators and ship’s crew.

The Isle of Man Ship Registry would like to bring attention to ship operators the Cargo Hazard Assessment Template (CHAT) developed by Vistrato Limited, for use prior to loading solid bulk cargoes. By systematically working through CHAT it can highlight the hazards associated with general dry cargo.

Following a near fatal asphyxiation on one of our vessels and following up on the [Cheshire Casualty](#) recommendations, the Isle of Man Ship Registry wish to re-iterate:

- Cases of asphyxiation and toxic exposure are far too common.
- There is no requirement to record gas readings for spaces surrounding the majority of “dry cargoes”, yet it’s a tool that can potentially save lives.

The IMO has published IMO Res. A.1050(27) which contains detailed guidance on **enclosed** space entry, “the hazards” cause “the effect” and this does not **just** apply to enclosed spaces, for ship’s carrying dry cargoes the bigger picture needs to be fully appreciated (the hazards/locale/surroundings). We are therefore recommending the use of CHAT in order to:

- Assist with a systematic consideration of cargo hazard aspects in order to mitigate operational risks (such as asphyxiation or poisoning); and
- encourage the use of atmosphere gas monitoring to assist in early identification via trend analysis of dangerous conditions within spaces on board a vessel.

Whilst CHAT was originally developed for bulk dry cargo it can easily be modified for general dry cargo. It is recommended that ship operators use it or take its content into account when producing their own operational procedures to systematically assess cargo hazards for their own trade.

Where CHAT indicates a hold entry permit is needed, or that a measurable gas hazard is possible, we strongly recommend operational procedures require space entry controls and/or record and visually trend with respect to time, gas levels within the cargo and/or adjoining spaces.

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.



ANNEX

Cargo Hazard Assessment Template									
Ship	Name:					Date:			
Terminal / Port	Name:					Time:			
Cargo	BCSN:			Class:		Group:			
Cargo Hold Access	IF Group B or A & B, have all cargo holds been secured against entry?: YES: NO:								
Cargo Hazards	Flammable solid:			Combustible:			Flammable Gasses:		
	Oxidising:			Oxygen Depleting:			Toxic:		
	Radioactive:			Corrosive:			Other:		
	Dusty:			Subsidiary Risk:					
Safety & Hazard Information	IMSBC Code:			Shipper's Information:			Safety Data Sheet/Other:		
Cargo Handling	Equipment:			Hazards and Controls:					
Weather	<ul style="list-style-type: none"> • Affect of wetting on cargo:..... • Action to be taken if risk of cargo being wetted due rain/snow/other:..... 								
Atmospheric Testing Requirements	Flammable Gasses:			Toxic Gasses:			Oxygen:		
	Methane:..... Hydrogen:..... Other:.....			Carbon Monoxide (CO):... Carbon Dioxide (CO2):..... Hydrogen Sulphide:..... Other:.....			Depletion:..... Excess:.....		
	Pre- Entry Test Required:.....			Test Intervals:.....			Personal Monitors Required:.....		
Test Instruments	Make:			Id. Number:			Calibration due:		
Cargo Holds to be Entered	No.1#	No.2#	No.3#	No.4#	No.5#	No.6#	No.7#	No.8#	No.9#
Hold Accesses, Ladders / Stairs	Open Type? Boxed/Enclosed Type?			Hazards:			Controls:		
Adjacent Spaces	Names of Spaces:.....					Potential Hazards:.....			
Ventilation	Status:			Mechanical:			Natural:		
PPE and other safety equipment	Safety Helmet	Safety Boots	Hi-Vis Clothing	Gloves	Dust Mask	Personal Gas Monitor	Other:		
Fumigation	Have holds been assessed by an authorized fumigator-in-charge and approved as gas free and safe for entry?						N/A	YES	NO
Enclosed Space Entry Permit	Is Hold Entry Permit Required? (see SMS procedures)						N/A	YES	NO
Attendant Person:	Is Attendant Person Required?						N/A	YES	NO
Rescue Plan	Is Rescue Plan in place for holds / spaces to be loaded/unloaded ?						N/A	YES	NO
	Is Rescue Team familiar with holds and hold accesses?						N/A	YES	NO
	Is Rescue Equipment available?						N/A	YES	NO
Emergency Communications	Are appropriate arrangements for enclosed space entry in place?						N/A	YES	NO
Signed: Master / Ch. Officer:.....					Date /Time.....				
Signed: Terminal Representative:.....					Date /Time.....				
Signed: Attendant Person:					Date /Time.....				
Initialed: Persons entering hold:									

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