

Updates on SOLAS CH II-1/3-6



**MARINER'S
UPDATE**

COMPLIANCE WITH SIMPLICITY

**Revised interpretation of requirements to
Permanent Means of Access (PMA)**

UPDATES ON SOLAS CH II-1/3-6

Revised interpretation of requirements to Permanent Means of Access (PMA)

IMPORTANT NOTICE

For ships fitted with Permanent Means of Access (PMA), the revised interpretation from the IMO introduces additional requirements that must be followed by ship owners and managers. This revised interpretation is particularly relevant for oil tankers and bulk carriers.

INTRODUCTION

The International Maritime Organization (IMO) has released a revised interpretation of SOLAS Regulation II-1/3-6 via MSC.1/Circ.1572/Rev.2. This update establishes more stringent expectations for the inspection, maintenance, and documentation of Permanent Means of Access (PMA) on vessels built on or after 1 January 2006.

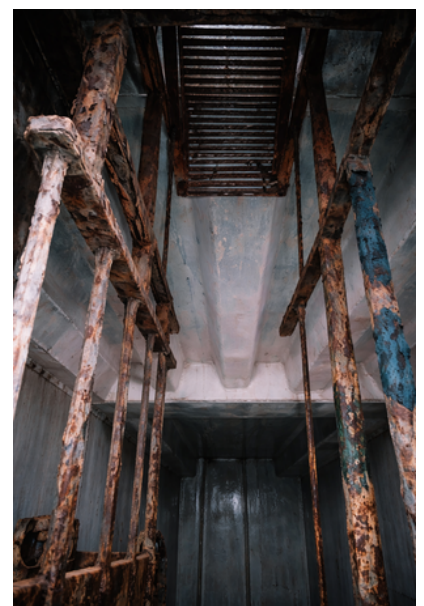
The revisions follow reports of a near-miss incident involving degraded inspection platforms. Consequently, the new guidelines aim to ensure that PMA remains safe and structurally sound throughout a vessel's operational life by mandating systematic inspection routines and rigorous record-keeping.

APPLICATION

The requirements set forth in MSC.1/Circ.1572/Rev.2 apply to crew-led inspections conducted after 1 January 2025.

The regulation applies to the following vessel types constructed on or after 1 January 2006:

- Oil Tankers: 500 GT and more
- Bulk Carriers: 20,000 GT and more



KEY REGULATORY CHANGES

Owners, managers, and crews must adhere to the following updated protocols:

1. Expanded Inspection Protocols

- Annual Reviews: All access arrangements, including portable equipment and fittings, must undergo an annual inspection.
- Clarification on Tank Entry: It has been clarified that "annual inspection" does not mandate opening cargo tanks solely for PMA checks. In alignment with SOLAS II-1/3-6 and major Flag State guidance, these inspections should occur when the space is otherwise accessed for scheduled surveys or when access is practicable.
- Pre-Entry Checks: Before any space is examined using PMA, a specific condition check of the access equipment must be performed and recorded for that individual space.

2. Standardized Assessment of Damage

- Where deterioration is identified (e.g., coating breakdown or material wastage), a formal assessment must be conducted to determine if the safety of the access arrangement is compromised.
- Findings classified as "substantial damage" must be explicitly recorded in Part 2 of the **Ship Structure Access Manual (SSAM)**.

3. Rigorous Documentation Requirements

Inspection records must be comprehensive and include:

- Date of inspection and the inspector's name/title.
- Specific sections of the access arrangements inspected.
- Verification of safe condition or details of identified damage.
- Descriptions of any repairs performed.
- Surveyor Access: These records must be made available to classification surveyors prior to any official surveys.

AMENDMENTS TO THE SHIP STRUCTURE ACCESS MANUAL (SSAM)

Ship operators are required to update their SSAM to reflect the provisions of MSC.1/Circ.1572/Rev.2. Additionally, IACS has introduced a revised template (IACS Rec. 90) to assist in standardizing these manuals.

- Approval Process: The updated SSAM does not need to be resubmitted for formal class approval.
- Verification: Class surveyors will verify the updated manual and its associated records during the vessel's subsequent scheduled surveys.

RECOMMENDATIONS

We strongly recommend that owners and operators perform a gap analysis to determine the impact of these IMO amendments on their current safety management systems.

Immediate actions should include:

- Updating the SSAM to comply with the new MSC provisions.
- Training crew members on the enhanced recording requirements for Part 2 of the SSAM.
- Ensuring all PMA inspection logs are current and ready for surveyor review after 1 January 2025.

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