

Amendment on 20 June 2025
Resolved by Technical Committee on 29 January 2025

Unified Interpretation for Inspections of the Means of Access

Object of Amendment

Rules for the Survey and Construction of Steel Ships Part C
Guidance for the Survey and Construction of Steel Ships Parts B, C and CS

Reason for Amendment

Regulation 3-6, Chapter II-1 of SOLAS specifies requirements and related technical provisions for the means of access for oil tankers and bulk carriers, and IMO circular MSC.1/Circ.1572/Rev.1 specifies unified interpretations for said requirements. The above-mentioned requirements have already been incorporated into the NK Rules and Guidance.

The report of an incident in which a means of access collapsed during renewal survey led to the IMO to subsequently investigate into the means of access installed on a number of bulk carriers, and this investigation found examples of serious wastage, corrosion, and deformation in the means of access platforms for upper cargo holds in several cases.

Based on the results of this investigation, a proposal to amend MSC.1/Circ.1572/Rev.1 with respect to a intervals and records of inspections of means of access was submitted to the 10th session of the IMO Sub-Committee on Ship Design and Construction (SDC10), and the amendments were approved at the 108th session of the IMO Maritime Safety Committee (MSC108) as MSC.1/Circ.1572/Rev.2.

Accordingly, relevant requirements are amended based on MSC.1/Circ.1572/Rev.2.

Outline of Amendment

Amends requirements for inspections of means of access by the crew or competent inspectors based on MSC.1/Circ.1572/Rev.2.

Effective Date and Application

Effective date of this amendment is 20 June 2025.

ID: DX24-07

An asterisk (*) after the title of a requirement indicates that there is also relevant information in the corresponding Guidance.

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p align="center">RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part C HULL CONSTRUCTION AND EQUIPMENT</p> <p align="center">Part 1 GENERAL HULL REQUIREMENTS</p> <p align="center">Chapter 14 EQUIPMENT</p> <p>14.16 Means of Access</p> <p>14.16.3 Means of Access in the cargo area of Oil Tankers and Bulk Carriers</p> <p>14.16.3.6 Ship Structure Access Manual* (-1 and -2 are omitted.)</p> <p>3 <u>With regard to the regular inspection and maintenance of the means of access specified in -2(1)(c), The Ship Structure Access Manual required by -1 above is to include the following (1) to (4) instructions.</u></p> <p><u>(1) The means of access arrangements, including portable equipment and attachments, are to be annually inspected by the crew or competent inspectors and the inspections are to be recorded in Part II of the Ships Structure Access Manual. In addition, prior to any space examinations that utilized the permanent means of access, an inspection to confirm the condition of the permanent</u></p>	<p align="center">RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part C HULL CONSTRUCTION AND EQUIPMENT</p> <p align="center">Part 1 GENERAL HULL REQUIREMENTS</p> <p align="center">Chapter 14 EQUIPMENT</p> <p>14.16 Means of Access</p> <p>14.16.3 Means of Access in the cargo area of Oil Tankers and Bulk Carriers</p> <p>14.16.3.6 Ship Structure Access Manual (-1 and -2 are omitted.)</p> <p>3 (Newly Added)</p>	<p>MSC.1/Circ.1572/Rev.2 Paragraph 1.4, unified interpretation of SOLAS REGULATION II-1/3-6, PARAGRAPH 2.3</p>

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p><u>means of access are to be recorded for each space.</u></p> <p><u>(2) Any Company authorized person using the means of access is to assume the role of inspector and check for obvious damage prior to using the access arrangements. Whilst using the means of access, 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 including loss of coating and wastage are 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 sections are not to be further used prior to effective repair. Substantial damage is to be reported in Part II of the Ship Structure Access Manual.</u></p> <p><u>(3) Statutory survey of any space that contains means of access is to include verification of the continued effectiveness of the means of access in that space. Survey of the means of access is not expected to exceed the scope and extent of the survey being undertaken. If the means of access is found deficient the scope of survey is to be extended if this is considered appropriate.</u></p> <p><u>(4) Records of all inspections are to be established based on the requirements detailed in the ship’s Safety Management System. The records are to be readily available to persons using the means of access and a</u></p>		

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p><u>copy attached to the Ship Structure Access Manual. The latest record for the portion of the means of access inspected are to include as a minimum the date of the inspection, the name and title of the inspector, a confirmation signature, the sections of means of access inspected, verification of continued serviceable condition or details of any deterioration or substantial damage found and repairs carried out. A file of permits issued should be maintained for verification. Inspection records of permanent means of access should be made available to the Society's surveyor prior to survey.</u></p> <p><u>4</u> (Omitted) <u>5</u> (Omitted)</p>	<p><u>3</u> (Omitted) <u>4</u> (Omitted)</p>	
<p>The effective date of the amendment is according to EFFECTIVE DATE AND APPLICATION (A)</p>		

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p align="center">GUIDANCE FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part B CLASS SURVEYS</p> <p align="center">B1 GENERAL</p> <p>B1.1 Surveys</p> <p>B1.1.3 Intervals of Class Maintenance Surveys (-1 and -2 are omitted.)</p> <p>3 The Occasional Surveys specified in 1.1.3-3(5), Part B of the Rules are as specified below: ((1) to (24) are omitted.)</p> <p><u>(25) Ship Structure Access Manual</u> The requirements for the ship structure access manual specified in 14.16.3.6, Part 1, Part C of the Rules or 26.2.6, Part CS of the Rules are to apply to inspections conducted by the crew or competent inspectors on or after 1 January 2025.</p>	<p align="center">GUIDANCE FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part B CLASS SURVEYS</p> <p align="center">B1 GENERAL</p> <p>B1.1 Surveys</p> <p>B1.1.3 Intervals of Class Maintenance Surveys (-1 and -2 are omitted.)</p> <p>3 The Occasional Surveys specified in 1.1.3-3(5), Part B of the Rules are as specified below: ((1) to (24) are omitted.)</p> <p>(25) (Newly added)</p>	
<p align="center">The effective date of the amendment is according to EFFECTIVE DATE AND APPLICATION (B)</p>		

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p align="center">RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part C HULL CONSTRUCTION AND EQUIPMENT</p> <p align="center">Part 1 GENERAL HULL REQUIREMENTS</p> <p align="center">C14 EQUIPMENT</p> <p><u>C14.16 Means of Access</u></p> <p><u>C14.16.3 Means of Access in the cargo area of Oil Tankers and Bulk Carriers</u></p> <p><u>C14.16.3.6 Ship Structure Access Manual</u> <u>1 Notwithstanding 14.16.3.6-3, Part 1, Part C of the Rules, a means of access (e.g. the means of access installed in the cargo tanks of oil tankers) may be inspected at appropriate intervals, such as at Docking Surveys, if it is considered not appropriate to be inspected annually.</u></p>	<p align="center">RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part C HULL CONSTRUCTION AND EQUIPMENT</p> <p align="center">Part 1 GENERAL HULL REQUIREMENTS</p> <p align="center">C14 EQUIPMENT</p> <p>(Newly added)</p> <p>(Newly added)</p>	

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p align="center">Appendix C3 SAMPLE OF SHIP STRUCTURAL ACCESS MANUAL</p> <p align="center">Part 1 Manual for Safe Access</p> <p>5 Instructions</p> <p>5.2 Instructions for Inspection and Maintenance of Means of Access</p> <p>5.2.1 Verification of means of access including portable equipment and their attachments is part of periodical surveys for continued effectiveness of the means of access in that space which is subject to the survey. After a space has been ventilated, cleaned and illuminated for the survey, an inspection of means of access should be carried out by the crew and/or an authorized person.</p> <p>5.2.2 Periodical inspections of means of access should be carried out by the crew and/or an authorized person as a part of regular inspection and maintenance, at intervals, which are determined taking into account any corrosive atmosphere that may be within the space, <u>but at a minimum annually</u>.</p> <p>5.2.3 Any authorized person using the means of access should assume the role of inspector and check for obvious damage prior to using the access arrangements. Whilst using the means of access, the inspector should 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 <u>including loss of coating and wastage</u> should be assessed as to whether the damage or deterioration affects the</p>	<p align="center">Appendix C3 SAMPLE OF SHIP STRUCTURAL ACCESS MANUAL</p> <p align="center">Part 1 Manual for Safe Access</p> <p>5 Instructions</p> <p>5.2 Instructions for Inspection and Maintenance of Means of Access</p> <p>5.2.1 Verification of means of access including portable equipment and their attachments is part of periodical surveys for continued effectiveness of the means of access in that space which is subject to the survey. After a space has been ventilated, cleaned and illuminated for the survey, an inspection of means of access should be carried out by the crew and/or an authorized person.</p> <p>5.2.2 Periodical inspections of means of access should be carried out by the crew and/or an authorized person as a part of regular inspection and maintenance, at intervals, which are determined taking into account any corrosive atmosphere that may be within the space.</p> <p>5.2.3 Any authorised person using the means of access should assume the role of inspector and check for obvious damage prior to using the access arrangements. Whilst using the means of access, the inspector should 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 should be assessed as to whether the damage or deterioration affects the safety for continued use of the</p>	<p>MSC.1/Circ.1572/Rev.2 Paragraph 1.4, unified interpretation of SOLAS REGULATION II-1/3-6, PARAGRAPH 2.3</p>

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p>safety for continued use of the access. Deterioration found that is considered to affect safe use should be determined as “substantial damage” and measures should be put in place to ensure that the affected section(s) are not to be further used prior to effective repair. <u>Substantial damage should be reported in Part II of the Ship Structure Access Manual.</u></p> <p>5.2.4 Periodical surveys of any space that contains means of access should include verification of the continued effectiveness of the means of access in that space. Usually, survey of the means of access is not expected to exceed the scope and extent of the survey being undertaken. If the means of access is found deficient the scope of survey should be extended if this is considered appropriate.</p> <p>5.2.5 Records of all inspections should be established based on the requirements detailed in the ships Safety Management System. The records should be readily available to persons using the means of access and a copy attached to the access manual. The latest record for the portion of the means of access inspected should include as a minimum the date of the inspection, the name and title of the inspector, a confirmation signature, the sections of means of access inspected, verification of continued serviceable condition or details of any deterioration or substantial damage found <u>and repairs carried out.</u> A file of permits issued should be maintained for verification. <u>Inspection records of permanent means of access should be made available to the Society’s surveyor prior to survey.</u></p> <p>(5.2.6 and 5.2.7 are omitted.)</p>	<p>access. Deterioration found that is considered to affect safe use should be determined as “substantial damage” and measures should be put in place to ensure that the affected section(s) are not to be further used prior to completing effective repair.</p> <p>5.2.4 Periodical surveys of any space that contains means of access should include verification of the continued effectiveness of the means of access in that space. Usually, survey of the means of access is not expected to exceed the scope and extent of the survey being undertaken. If the means of access is found deficient the scope of survey should be extended if this is considered appropriate.</p> <p>5.2.5 Records of all inspections should be established based on the requirements detailed in the ships Safety Management System. The records should be readily available to persons using the means of access and a copy attached to the access manual. The latest record for the portion of the means of access inspected should include as a minimum the date of the inspection, the name and title of the inspector, a confirmation signature, the sections of means of access inspected, verification of continued serviceable condition or details of any deterioration or substantial damage found. A file of permits issued should be maintained for verification.</p> <p>(5.2.6 and 5.2.7 are omitted.)</p>	

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p align="center">Part II Records for Means of Access</p> <p>7 Records of Inspections and Maintenance</p> <p><i>[Prepared appropriately]</i> <i>Note: The record for the portion of the means of access inspected should include, as a minimum, the date of the inspection, the name and title of the inspector, a confirmation signature, the sections of the means of access inspected, verification of continued serviceable condition or details of any deterioration or substantial damage found and <u>repairs carried out.</u></i></p>	<p align="center">Part II Records for Means of Access</p> <p>7 Records of Inspections and Maintenance</p> <p><i>[Prepared appropriately]</i> <i>Note: The record for the portion of the means of access inspected should include, as a minimum, the date of the inspection, the name and title of the inspector, a confirmation signature, the sections of the means of access inspected, verification of continued serviceable condition or details of any deterioration or substantial damage found.</i></p>	
<p align="center">The effective date of the amendment is according to EFFECTIVE DATE AND APPLICATION (A)</p>		

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p align="center">GUIDANCE FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part CS HULL CONSTRUCTION AND EQUIPMENT OF SMALL SHIPS</p> <p align="center">CS26 MEANS OF ACCESS</p> <p align="center">CS26.2 Special Requirements for Oil Tankers</p> <p align="center">CS26.2.6 Ship Structure Access Manual</p> <p>1 (Omitted)</p> <p>2 <u>With regard to the regular inspection and maintenance of the means of access specified in -1(1)(c), the Ship Structure Access Manual is to include the following (1) to (4) instructions.</u></p> <p>(1) <u>The means of access arrangements, including portable equipment and attachments, are to be annually inspected by the crew or competent inspectors and the inspections are to be recorded in Part II of the Ships Structure Access Manual. In addition, prior to any space examinations that utilized the permanent means of access, an inspection to confirm the condition of the permanent means of access are to be recorded for each space.</u></p> <p>(2) <u>Any Company authorized person using the means of access is to assume the role of inspector and check for obvious damage prior to using the access</u></p>	<p align="center">GUIDANCE FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS</p> <p align="center">Part CS HULL CONSTRUCTION AND EQUIPMENT OF SMALL SHIPS</p> <p align="center">CS26 MEANS OF ACCESS</p> <p align="center">CS26.2 Special Requirements for Oil Tankers</p> <p align="center">CS26.2.6 Ship Structure Access Manual</p> <p>1 (Omitted)</p> <p>(Newly added)</p>	<p>MSC.1/Circ.1572/Rev.2 Paragraph 1.4 unified nterpretation of SOLAS REGULATION II-1/3-6, PARAGRAPH 2.3</p>

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p><u>arrangements. Whilst using the means of access, 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 including loss of coating and wastage are 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 sections are not to be further used prior to effective repair. Substantial damage is to be reported in Part II of the Ship Structure Access Manual.</u></p> <p>(3) <u>Statutory survey of any space that contains means of access is to include verification of the continued effectiveness of the means of access in that space. Survey of the means of access is not expected to exceed the scope and extent of the survey being undertaken. If the means of access is found deficient the scope of survey is to be extended if this is considered appropriate.</u></p> <p>(4) <u>Records of all inspections are to be established based on the requirements detailed in the ship’s Safety Management System. The records are to be readily available to persons using the means of access and a copy attached to the Ship Structure Access Manual. The latest record for the portion of the means of access inspected are to include as a minimum the date of the inspection, the name and title of the</u></p>		

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
<p><u>inspector, a confirmation signature, the sections of means of access inspected, verification of continued serviceable condition or details of any deterioration or substantial damage found and repairs carried out. A file of permits issued should be maintained for verification. Inspection records of permanent means of access should be made available to the Society's surveyor prior to survey.</u></p> <p><u>3</u> Notwithstanding -2(1) above, a means of access (e.g. the means of access installed in the cargo tanks of oil tankers) may be inspected at appropriate intervals , such as at Doking Surveys, if it is considered not appropriate to be inspected annually.</p> <p><u>4</u> (Omitted)</p> <p><u>5</u> (Omitted)</p>	<p>(Newly added)</p> <p><u>2</u> (Omitted)</p> <p><u>3</u> (Omitted)</p>	
<p>The effective date of the amendment is according to EFFECTIVE DATE AND APPLICATION (B)</p>		

Amended-Original Requirements Comparison Table (Unified Interpretation for Inspections of the Means of Access)

Amended	Original	Remarks
EFFECTIVE DATE AND APPLICATION (A)		
<ol style="list-style-type: none"> 1 The effective date of the amendments is 20 June 2025. 2 Notwithstanding the amendments, the current requirements apply to inspections conducted by the crew or competent inspectors is before the effective date. 3 For ships subject to Part C of the Guidance for the Survey and Construction of Steel Ships prior to its comprehensive revision by Notice No.47 on 1 July 2022 (herein after referred to as “old Part C of the Guidance”), this amendment also applies to following requirements. C35.2.6, old Part C of the Guidance 5.2, Part I, Appendix C3, old Part C of the Guidance 		
EFFECTIVE DATE AND APPLICATION (B)		
<ol style="list-style-type: none"> 1 The effective date of the amendments is 20 June 2025. 2 Notwithstanding the amendments, the current requirements apply to the surveys for which the application is submitted to the Society before the effective date. 		