



Marine Notice 18/2011
Supersedes 10/2008

Safe access and operational safety during cargo operations

Purpose

The purpose of this notice is to remind masters, crew, terminal operators, cargo planners and other relevant personnel of their responsibilities regarding safety and the precautions that should be taken when planning and undertaking cargo operations in any hold of a vessel.

Background

Marine Orders Part 32: *Cargo Handling Equipment* is mandatory for Australian registered vessels wherever they are and for foreign vessels when loading or unloading at a port in Australia or in an external territory of Australia. In particular this Marine Order articulates the obligations with regards to providing and maintaining a safe and unobstructed means of access to ships cargo holds. It also provides for a Person in Charge (PIC) whose duties include overseeing cargo operations to ensure that they are safe, including the power for the PIC to prevent a cargo operation from commencing or continuing if he or she deems the operation to be unsafe.

Safe access to holds

Industry may be aware of recent occurrences where ships loaded in overseas ports have presented at an Australian port with a requirement for personnel to access the centre of the cargo hold. To achieve this access, personnel have been required to climb over, or pass around cargo at the hold ends. This, depending on the cargo consignment and stowage, could be dangerous, especially if emergency access or egress is required.



Cargo in hold ends limiting access to hold ladders from the centre of cargo hold

(Note the lack of protective fencing/netting or portable ladders to enable access/egress from the far end of the cargo hold to the centre of the cargo hold).

All those involved in the preparation of cargo stowage plans for ships requiring loading or unloading in Australian ports are therefore reminded of their statutory obligations under Marine Orders Part 32 to ensure safe access including:

- that all ships maintain at least one unobstructed and safe means of access from the uppermost deck of the space to the level at which loading or unloading is taking place;
- that there is a protective fence or netting to guard against a fall if the height at which personnel are working or transiting exceeds two metres; and
- the requirements for the use of portable ladders that may be used to access cargo, including securing arrangements.

It is recommended that cargo planners and ship's masters review their procedures to ensure that appropriate measures are in place to avoid instances where personnel are required to access cargo with blocked hold ends. This may include reviewing port rotations or the way cargo is presented.

Personnel safety whilst in a hold

It has come to AMSA's attention that there have been some "near miss" incidents in Australian bulk ports where crew members have still been inside a cargo hold when cargo loading in that hold has commenced.

Masters are reminded of the requirement of Section 7 of the International Safety Management Code regarding the development of plans for shipboard operations. In accordance with this Code the vessel's Safety Management System should include a procedure to ensure that all persons are out of cargo holds before permission is granted to commence loading in that hold. Failure to have such a procedure or to diligently apply that procedure could be an actionable non-compliance, but more importantly could place workers at risk.

The PIC should also ensure effective procedures are in place to ensure cargo operations are not permitted to be undertaken until it is confirmed that all unauthorised personnel are clear of the intended area of operations.

All persons involved in cargo loading and unloading operations are reminded that routine ship inspections by AMSA Surveyors include verifying compliance with the provisions of Marine Orders Part 32. This may include verifying the means of access and egress from ship's cargo holds, protective fencing or netting arrangements, and portable ladder arrangements. Masters should also be aware that Marine Orders Part 32 contains penal provisions and allows for AMSA to prohibit unsafe or inadequate arrangements until appropriate corrective actions are taken.

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