Ship Structure Access Manual for Liberian Flagged Ships

ClassNK Technical Information

To whom it may concern

The revision of the unified Interpretation on the means of access (MSC.1/Circ.1572/Rev.2) was notified in ClassNK Technical Information No. TEC-1336 (issued on 26 November 2024).
The Liberian Administration has recently issued Marine Notice SAF-010 Rev.07/26, which clarifies that a copy of the interpretation of SOLAS Regulation II-1/3-6, paragraph 2.3 in MSC.1/Circ.1572/Rev.2 be included in the Ship Structure Access Manual.
Shipyards, design companies, shipowners and ship management companies are therefore requested to ensure that a copy of the interpretation of SOLAS Regulation II-1/3-6, paragraph 2.3 (Appendix 2) is included in the Ship Structure Access Manual for both new buildings and existing ships.
For existing ships, submission of the updated Ship Structure Access Manual to ClassNK and re-approval are not required.
Please note that ClassNK Technical Information No. TEC-1336 remains applicable.

For any questions about the above, please contact:

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Attachment:

1. Marine Notice SAF-010 Rev.07/26
2. Excerpt from MSC.1/Circ.1572/Rev.2: SOLAS Regulation II-1/3-6, Paragraph 2.3

NOTES:

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THE REPUBLIC OF LIBERIA
LIBERIA MARITIME AUTHORITY

Office of
Deputy Commissioner
of Maritime Affairs

Marine Notice

SAF-010
Rev. 07/26

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND AUTHORIZED CLASSIFICATION SOCIETIES

SUBJECT: Approval of Ship Structural Access Manuals (SSAM)

References: (a) Maritime Law 10.296(5)
(b) Regulation II-1/3-6 of SOLAS 74, as amended
(c) Resolution MSC.133(76) as amended by Resolution MSC.158(78)

Supersedes: Marine Notice SAF-010, dated 05/26

The following changes have been included:

a. Section 1.2 i) revised to clarify inspection interval for permanent means of access (PMA) to cargo oil tanks, further to the guidance in MSC.1/Circ.1572/Rev.2, and to advise that records should be readily available to persons using the means of access and a copy attached to the SSAM even if inspection records are kept in a vessel's PMS, and that a copy of the interpretation be included in the SSAM.
b. Appendix II updated for latest checklist

PURPOSE:

This Notice provides guidance to vessel owners, operators and managers in the development and approval of Ship Structural Access Manuals (SSAM) to meet the requirements of regulation II-1/3-6 of SOLAS, as amended.

APPLICABILITY:

The requirement applies to oil tankers of 500 GT and over and bulk carriers (as defined in regulation IX/1 of SOLAS) of 20,000 GT and over, constructed on or after 1 January 2005.

1.0 REQUIREMENTS:

1.1 Regulation II-1/3-6 of SOLAS, as amended, requires that each space in the cargo area and forward spaces in oil tankers of 500 GT and over and bulk carriers of 20,000 GT and over constructed on or after 1 January 2005, are to be provided with means of access to enable, throughout the life of the ship, overall and close-up inspections and thickness measurement of the ship's structures. 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

Inquiries concerning the subject of this Notice should be directed to the Office of the Deputy Commissioner, Republic of Liberia, the Liberian International Ship & Corporate Registry, LLC, 22980 Indian Creek drive, Suite 200, Dulles, VA 20166, USA

permanent means of access, provision of movable or portable means of access may be considered, provided the means of attaching, rigging, suspending or supporting these alternative means of access form a permanent part of the ship's structure. Such alternative means of access can be used independently or in combination with the provided permanent means of access.

1.2 SOLAS further requires that a ship's means of access to carry out overall and close-up inspections and thickness measurements shall be described in a SSAM approved by the Administration, an updated copy of which shall be kept on board. The SSAM shall include the following for each space in the cargo area:

a) Plans showing the means of access to the space, with appropriate technical specifications and dimensions;

b) Plans showing the means of access within each space to enable an overall inspection to be carried out, with appropriate technical specifications and dimensions;

c) The plans shall indicate from where each area in the space can be inspected;

d) 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;

e) Instructions for inspecting and maintaining the structural strength of all means of access and means of attachment, considering any corrosive atmosphere that may be within the space;

f) Instructions for safety guidance when rafting is used for close-up inspections and thickness measurements;

g) Instructions for the rigging and use of any portable means of access in a safe manner;

h) An inventory of all portable means of access; and

i) Records of periodical inspections and maintenance of the ship's means of access arrangements. Interpretation of SOLAS Regulation II-1/3-6, paragraph 2.3 in **MSC.1/Circ.1572/Rev.2**[1]**,** should be taken into consideration when preparing this section (a copy of the interpretation be included in the SSAM), particularly the verification of the condition of the means of access:

[1] The inspection of PMA located inside cargo oil tanks is not required to be carried out at least every year, but when such inspections are performed whenever the tanks are opened for survey, maintenance, tank cleaning, repair, ESP, coating inspection, thickness measurements, or other reasons.

- Any Company authorized person using the means of access should assume the role of inspector and check for obvious damage prior to using the access arrangements
- 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 including loss of coating and wastage should 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 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
- Substantial damage should be reported in Part 2 of the SSAM
- 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 and repairs carried out
- A file of permits issued should be maintained for verification
- The records should be readily available to persons using the means of access and a copy attached to the Ship Structure Access Manual, even if inspection records are kept in a vessel's PMS
- Inspection records of permanent means of access should be made available to classification society surveyors prior to survey

1.3 The SSAM shall be approved by the Administration in accordance with Section 3 of this Notice.

2.0 SSAM PREPARATION

2.1 The SSAM should be prepared taking into account the technical provisions in **Resolution MSC.133(76) as amended by Resolution MSC.158(78)**.

2.2 A model format for a SSAM is provided as Appendix 1 of this Marine Notice.

2.3 The SSAM shall be written and available in English and a working language understood by the master and officers, if the working language is not English.

2.4 Each SSAM must identify the ship to which it applies, using the ship's name and IMO number.

3.0 REVIEW AND APPROVAL

3.1 All SSAMs required under regulation II-1/3-6 of SOLAS, as amended, must be approved by the Administration or an authorized RO.

3.2 The SSAM that is submitted for approval to the Administration shall be in English.

3.3 A hard copy of the SSAM may be sent to:

The Office of the Deputy Commissioner of Maritime Affairs, Republic of Liberia,

Liberian International Ship & Corporate Registry, LLC,
Attn: Plan Review
22980 Indian Creek drive, Suite 200 Dulles,
Virginia 20166, USA

A soft copy of the SSAM may be sent to regsandstandards@liscr.com.

3.4 If the SSAM is submitted to the Administration for review, the following documents are also required to be provided, as applicable:

a) General arrangement plan
b) Tank arrangement
c) Record of inspection
d) Inventory of portable means of access
e) Access hatch arrangement
f) Water ballast tanks – permanent ladder arrangement
g) Cargo tanks – permanent ladder arrangement
h) Engine room tanks – permanent ladder arrangement
i) F.O tanks – means of access
j) Void spaces mean of access.

3.5 To facilitate the review and plan approval process, it is recommended to complete the checklist in Appendix II to this notice which will be used by the Administration for plan approval and attach it to the submitted plan. The checklist identifies the applicable sections of the SSAM.

Questions regarding this instruction, SOLAS requirements, and fees for SSAM review and approval should be referred to regsandstandards@liscr.com or you may call +1-703-790-3434.

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APPENDIX I

MODEL FORMAT OF SHIP STRUCTURAL ACCESS MANUAL

Cover Page

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Record of changes

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Part I: Manual for Safe Access

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2.4. Approval/Re-approval
3. Definitions
4. Access Plans
5. Instructions.
5.1. Instructions for Use of Means of Access
5.2. Instructions for Inspection and Maintenance of Means of Access
5.3. Instructions for Rigging and Use of Portable Means of Access
5.4. Instructions for Safety Rafting
5.5. Instructions for Use of Moveable Platforms and Staging
5.6. Instructions for Use of Wire Lift Platform
5.7. Instructions for Use of Hydraulic arm vehicles
6. Inventory of Portable Means of Access

Part II – Records for Means of Access

7. Records of Inspection and Maintenance
8. Records of Change of Portable Means of Access

Appendices

APPENDIX 2

Ship Structural Access Manual (SSAM) Plan Questionnaire

VESSEL NAME: _____ **DATE:** _____/_____/_____

Questionnaire	Y	N	Page/item in plan
Ship Structural Access Manual (SSAM) Basic Requirements from SOLAS Chapter II-1, Reg 3-6			
Preamble			
Introduction. An introductory paragraph summing up the intent of the plan.	☐	☐	
Ship Particulars:			
Ship specific information: ✓ Name; ✓ Flag; ✓ Port of Registry; ✓ Gross Tonnage; ✓ IMO Number; ✓ LOA ✓ Length between BP, ✓ Beam, ✓ Call Sign, ✓ Class notation;	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	
Index. An index of sections to be included to reference the contents of the manual.	☐	☐	
Purpose: A brief introduction for the ship's crew, explaining the need for the ship structural access manual and the importance of accurate record keeping.	☐	☐	
General arrangement Plan	☐	☐	
Scope of the Manual			
General information containing the following: ✓ Definitions; ✓ Instructions for use of the manual; ✓ Instructions for inspection and maintenance of means of access; ✓ Instructions for the rigging and use of portable means of access; ✓ Instructions for safety rafting and guidance to be used for close-up inspections and thickness measurements ✓ Inventory of portable means of access ✓ Records of periodical inspections and maintenance of the ship's means of access (taking into consideration interpretation of SOLAS Regulation II-1/3-6, paragraph 2.3 in MSC.1/Circ.1572/Rev.2, a copy of which is to be contained in a section of the SSAM)	☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐	

Access Hatch Arrangement:			
✓ Drawings of access hatch arrangement, openings, or manhole with dimensions ✓ Dimensions within requirements (all ships) * *For oil tankers less than 5,000 DWT (smaller dimensions can be proved satisfactory to the Administration)	☐ ☐	☐ ☐	
Water Ballast Tanks – Permanent ladder: (All Ships)			
Drawing of access to all Ballast Tanks including FP and AFT Peak tanks for overall inspection	☐	☐	
General information containing the following: ✓ Technical specifications; ✓ Dimensions; ✓ Details on positions of critical areas ✓ Details on the means of access (portable or permanent) ✓ Areas can be inspected	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐	
Cargo Tanks – Permanent ladder Arrangement - (Tankers only)			
Drawings of access to all Cargo Tanks for overall inspection	☐	☐	
General information containing the following: ✓ Technical specifications; ✓ Dimensions; ✓ Details on positions of critical areas ✓ Details on the means of access (portable or permanent) ✓ Areas can be inspected	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐	
Engine Room Tanks - Permanent ladder Arrangement- (All Ships)			
Drawings of access to all Engine Room Tanks for overall inspection	☐	☐	
General information containing the following: ✓ Technical specifications; ✓ Dimensions; ✓ Details on positions of critical areas ✓ Details on the means of access (portable or permanent) ✓ Areas can be inspected	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐	
HFO Storage Tanks (All Ships)			
Drawings of access to all HFO Storage Tanks for overall inspection	☐	☐	
General information containing the following: ✓ Technical specifications; ✓ Dimensions; ✓ Details on positions of critical areas ✓ Details on the means of access (portable or permanent) ✓ Areas can be inspected	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐	

VOID Spaces (All Ships)			
Drawings of access to all VOID Spaces for overall inspection	☐	☐	
General information containing the following: ✓ Technical specifications; ✓ Dimensions; ✓ Details on positions of critical areas ✓ Details on the means of access (portable or permanent) ✓ Areas can be inspected	 ☐ ☐ ☐ ☐ ☐	 ☐ ☐ ☐ ☐ ☐	
Cargo Tanks (Bulk Carriers)			
Drawings of access to all Cargo Tanks for overall inspection	☐	☐	
General information containing the following: ✓ Technical specifications; ✓ Dimensions; ✓ Details on positions of critical areas ✓ Details on the means of access (portable or permanent) ✓ Areas can be inspected	 ☐ ☐ ☐ ☐ ☐	 ☐ ☐ ☐ ☐ ☐	

Technical background

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

1.4 SOLAS REGULATION II-1/3-6, PARAGRAPH 2.3

Interpretation

Inspection

The means of access arrangements, including portable equipment and attachments, should be annually inspected by the crew or competent inspectors and the inspections should be recorded in Part 2 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 should be recorded for each space.

Procedures

1 Any Company 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 including loss of coating and wastage should 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 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. Substantial damage should be reported in Part 2 of the Ship Structure Access Manual.

2 Statutory survey of any space that contains means of access should include verification of the continued effectiveness of the means of access in that space. Survey of the means of access should not be 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.

3 Records of all inspections should be established based on the requirements detailed in the ship's Safety Management System. The records should 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 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 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 classification society surveyors prior to survey.

Technical background

It is recognized that means of access 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, and mechanical damage in cargo hold. Means of access therefore should be inspected at every opportunity of tank/space entry, but at a minimum annually. The above interpretation should be contained in a section of the Ship Structure Access Manual.