



### BRS CIRCULAR

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Date:	14.05.2026	<b>Recommendations for entering enclosed spaces aboard ships MSC.581(110)</b>
Substitutes	-	
Amendment to	-	
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Notice to: Ship Owners/ Managers/ Operators/ Surveyors/ Auditors

Bulgarian Register of Shipping draws the attention of Shipowners, Managers, Masters, and BRS Surveyors to **IMO Resolution MSC.581(110)**, *Revised Recommendations for Entering Enclosed Spaces Aboard Ships*, adopted on **27 June 2025**, which replaces the previous IMO recommendations and introduces **enhanced safety expectations, procedural clarity, and training requirements**.

The recommendations emphasize the use of portable gas detection equipment, including CO<sub>2</sub> measurement, and the maintenance of a formal register of enclosed spaces onboard.

These measures aim to enhance crew safety by identifying potential hazards, such as oxygen deficiency or toxic/asphyxiant gases, prior to entry into confined spaces.

#### Points to Note

Companies and vessels should ensure:

#### Portable Gas Detection Equipment

- All ships shall carry at least two (2) sets of portable gas detection equipment, in accordance with SOLAS regulation XI-1/7 and paragraph 7.3 of Resolution MSC.581(110).
- Where the vessel is certified to carry cargoes under the IMDG Code and/or Group B cargoes of the IMSBC Code, in addition two (2) portable gas detectors shall be carried, fitted with flexible hoses or suitable sampling arrangements for remote atmosphere testing of enclosed spaces.
- Portable gas detectors are available and capable of measuring CO<sub>2</sub> as well as other relevant gases, properly calibrated, and maintained.
- Crew and Surveyors entering enclosed spaces are provided with personal, portable gas detectors capable of continuously monitoring:
  - Oxygen (O<sub>2</sub>)
  - Carbon dioxide (CO<sub>2</sub>)
  - Flammable gases or vapours (LEL/LFL)
  - Toxic gases (including CO)
  - Any other gases identified in the risk assessment
- Verify existing detector capability; replace or supplement as needed.
- Update SMS training, familiarization, maintenance, and calibration records.

#### Enclosed Space Entry Criteria

- Single-person entry is not permitted.

- Entry doors/access hatches must be secured unless the space has been risk-assessed, ventilated, atmospherically tested, and declared safe.
- Entry is only allowed when stable atmospheric readings confirm that all parameters are within acceptable limits:
  - O<sub>2</sub> ≥ 20.9% by volume
  - CO<sub>2</sub> < 0.5% by volume (5,000 ppm)
  - Flammable gases/vapours < 1% of LFL
  - Toxic gases/vapours < 50% of applicable OEL
- Proper illumination, communication, PPE, attendant, rescue/resuscitation equipment, and entry permit issuance.

### **Enclosed Space Register**

- Establish and maintain the Enclosed Space Register onboard and ashore, ensuring it is regularly reviewed and updated based on cargo operations, structural changes, or hazard re-assessment.
- Include all connected and adjacent spaces in the register and risk assessments.
- Ensure these spaces are tested and ventilated as part of entry preparation.
- Assume connected and adjacent spaces are hazardous until proven otherwise.

### **Emergency Response and Risk Assessment**

- Develop/update ship-specific Enclosed Space Emergency Response Plans, detailing rescue roles, equipment, communication, and procedures.
- Conduct regular rescue drills and ensure all rescue equipment is functional and accessible.
- Strengthen SMS risk assessment procedures, documenting hazards, residual risks, and mitigations before permitting entry.
- Distribute cargo hazard information and incorporate it into risk assessments.

### **Entry Permit, Signage, and Equipment**

- Enclosed Space Entry Permits must have a maximum validity of 8 hours.
- Emergency Escape Breathing Devices (EEBDs) are only for escape, not entry.
- Access points should be clearly marked as SAFE or UNSAFE for entry, and signage updated as space status changes.

Act now

Ship Owners / Managers / Operators / Surveyors / Auditors should review onboard equipment and procedures to ensure compliance with the revised recommendations for enclosed space entry. **Bulgarian Register of Shipping auditors will verify compliance during the first company-level or shipboard audit.**

For further guidance, companies may refer to the IMO [Resolution MSC.581\(110\)](#).