Red Ensign Group

**Unified Interpretation**

# REG-UI 010

# Inspections of means of access for cargo spaces

**SOLAS Chapter II-1 Regulation 3-6 - Access to and within spaces in, and forward of, the cargo area of oil tankers and bulk carriers**

**MSC.1/Circ.1572/Rev.2 – Unified interpretations of Solas Chapter II-1 – Regulation 3-6, Paragraph 2.3**

**Notice to all Recognised Organisations, Ship Owners, Ship Operators, Ship Managers, Ships' Officers and Surveyors.**

*This Unified Interpretation should be read in conjunction with MSC.1/Circ.1572/Rev.2, section 1.4 and remains extant until rescinded or amended.*


**Summary**

This Red Ensign Group (REG) Unified Interpretation (REG-UI) has been published to advise of the Red Ensign Group's interpretation and requirements in relation to *MSC.1/Circ.1572/Rev.2, section 1.4 – annual inspections of means of access to cargo and other spaces*.

The guidance and requirements contained within this document are in accordance with the requirements in force at the time of publication. Nevertheless, Masters and Operators of REG ships should refer to the requirements in force as applicable.

In the case of any clarification being required, the relevant REG Administration should be contacted.


## 1. Introduction

1.1 Under the interpretation contained within *MSC.1/Circ.1572/Rev.2, section 1.4*, the means of access arrangements, including portable equipment and attachments to cargo and other spaces, should be annually inspected and recorded by the crew or competent inspectors. These inspections are separate from the periodical statutory surveys on the part of the RO.

1.2 The Red Ensign Group (REG) is fully supportive of the overall intent of *MSC.1/Circ.1572/Rev.2, section 1.4* in respect of the safety of personnel which may be placed at risk as a result of deterioration of any such means of access.

1.3 Notwithstanding section 1.2 above, the REG notes that whilst the atmospheric and structural exposure of means of access on bulk carriers may be conducive to both mechanical damage and atmospheric corrosion, this may not necessarily be the case in

respect of other ship types such as oil and chemical tankers. The predominant atmosphere of cargo tanks on oil and chemical tankers should not be conducive to effective atmospheric corrosion and should be less exposed to mechanical damage given the carriage of liquid cargoes in enclosed tanks.

1.4 Furthermore, REG Administrations are conscious of the potential impracticalities for the application of annual inspections to the cargo spaces of oil and chemical tankers. For the means of access to be inspected in cargo spaces, such spaces will be potentially required to undergo tank washing and be gas free to allow inspection. These prerequisites must be carried out in accordance with all applicable requirements, including, where applicable, the provisions of MARPOL Annex II relating to tank washings. Meeting these requirements may necessitate additional supporting logistical arrangements, potentially including the withdrawal of the vessel from service.

## 2. Requirements for REG Ships

2.1 REG Administrations will not extend the requirement contained within *MSC.1/Circ.1572/Rev.2, section 1.4, "Inspection"*, in respect of annual inspections of the means of access provided within cargo spaces on oil and chemical tankers subject to the following conditions:

2.1.1 Means of access for cargo spaces should be inspected whenever the space is accessed and inspection is practicable, and in all cases prior to the means of access used;

2.1.2 In respect of section 2.1.1 above, any such inspections shall be subject to adherence with the requirements contained within *MSC.1/Circ.1572/Rev.2, section 1.4, "Procedures"*.

2.2 Notwithstanding the above, the inspection of means of access to cargo spaces on REG ships shall be inspected during the periodical statutory surveys pursuant to SOLAS Chapter I, Regulation 10.

### More Information

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REG Member Ref: REGTF#135

Published: October 2026
Please note that all addresses are correct at time of publishing

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