



**FSC Class**  
FORESIGHT SHIP CLASSIFICATION  
福 氏 船 级 社

Circular No.FSC202501

**主题：迎检指南—进入船舶密闭空间（中国海事局专项治理行动）**  
**RE : Circular on Releasing Inspection Guide for Entering the enclosed spaces on ships (Special Governance Action of MSA)**

至：各船东及船舶管理公司、有关部门、本社验船师及审核员：

TO : Shipowners, Managers, Relevant departments, Surveyors and Auditors:

2025年1月15日至2025年10月14日，中国海事局开展为期9个月的专项治理行动，主题为“违规进入船舶危险密闭空间行为”。为做好此次专项治理行动迎检工作，我社特发布迎检指南，具体内容如下：

From January 15, 2025 to October 14, 2025, MSA will carry out a 9-month special governance action, with the theme of "Unauthorized entry into dangerous enclosed spaces on ships". In order to prepare for the inspection work for this special governance action, our company has issued a guide for inspection, which includes the following specific contents:

● **检查对象 Inspection object**

在专项治理行动期间，靠泊中国港口的船舶。During the special governance action, ships berthed at Chinese ports.

● **检查方式 Inspection method**

文件资料核查+演习。通常情况下，文件资料核查发现缺陷后，可能转为实际演习检查。Document verification+drill. Usually, after discovering defects in document verification, it may be turned into actual drill inspection.

## ● 检查重点项目 Key inspection items

中国海事局公布了此次专项治理行动的检查清单，如下：

MSA has released the inspection checklist for this special governance action, as follows:

Q1: 责任船员是否意识到进入封闭处所风险? Are responsible crew members aware of the risks of entering enclosed spaces?

Q2: 船舶是否对进入封闭处所作业人员进行了有效管控? Has the vessel effectively controlled personnel entering enclosed spaces for operations?

Q3: 船舶是否有完整的封闭处所清单? Does the vessel have a complete list of enclosed spaces?

Q4: 船舶封闭处所是否正确标识和控制? Is the enclosed spaces of the ship properly marked and controlled?

Q5: 气体检测与监测设备是否定期检测和校准? Are gas detection and monitoring equipment regularly inspected and calibrated?

Q6: 应急救助与防护设备是否良好? Are emergency rescue and protective equipment in good condition?

Q7: 作业人员是否熟悉封闭处所风险评估操作? Are the operators familiar with risk assessment operations in enclosed spaces?

Q8: 作业人员是否熟悉安全防护用品等设备操作? Are the operators familiar with the operation of safety protection equipment and other devices?

Q9: 封闭处所进入和救助演习是否符合公约要求? Does the enclosed spaces entry and rescue drill comply with the requirements of the convention?

Q10: 封闭处所作业有关体系文件是否在船舶有效实施? Have the relevant system documents for working in enclosed spaces been effectively implemented on ships?

## ● 船舶密闭处所的确认 Confirmation of enclosed spaces on ships

船舶封闭处所，即具备下列条件之一的船舶处所：

Enclosed space means a space which has any of the following characteristics:

- a) 存在受限的出入口; Limited openings for entry and exit;
- b) 通风不足; Inadequate ventilation; and
- c) 非设计为连续有人员作业。 is not designed for continuous worker occupancy.

包括但不限于货舱、双层底、燃油舱（柜）、压载舱、货泵室、货物压缩机室、隔离空舱、锚链舱、空舱、箱形龙骨、保护层间处所、锅炉、发动机曲拐箱、发动机扫气箱、污水舱（柜），以及不用于放置货物但可能与船舶封闭处所具有相同空气环境特征未通风的相邻处所。该清单并不详尽，应逐船列出清单，以确定密闭空间。 Includes, but is not limited to, cargo hold, double bottom, fuel tank (cabinet), ballast tank, cargo pump room, cargo compressor room, isolated empty cabin, anchor chain cabin, empty cabin, box keel, protective inter layer space, boiler, engine crankcase, engine scavenging box, sewage tank (cabinet), and adjacent spaces that are not used to store cargo but may have the same air environment characteristics as enclosed spaces on the ship without ventilation. This list is not exhaustive and a list should be produced on a ship-by-ship basis to identify enclosed spaces.

船舶应根据安全管理体系进行核对，密闭处所清单是否覆盖了船上所有要求的密闭处所。 Ships should verify whether the list of enclosed spaces covers all required enclosed spaces on board according to the safety management system.

## ● **进入船舶密闭处所主要操作流程 Main operating procedures for entering enclosed spaces on ships**

a) 风险评估。进行风险评估，包括识别潜在的危险如缺氧、有毒气体、可燃气体等。 Risk assessment. Conduct risk assessment, including identifying potential hazards such as hypoxia, toxic gases, flammable gases, etc.

b) 安全交底。向作业人员进行详细的安全交底，包括封闭处所的位置、内部结构、作业内容、可能出现的缺氧以及有毒有害、可燃气体的等情况。 Safety briefing. Provide detailed safety briefing to the operators, including the location of enclosed spaces, internal structure, job content, possible oxygen deficiency, toxic and harmful gases, and flammable gases.

c) 通风换气。确保拟进入的封闭处所进行持续有效的通风，并在入口处设置警示标识和监护人员。 Ventilation and air exchange. Ensure continuous and effective ventilation in the enclosed area to be entered, and set up warning signs and monitoring personnel at the entrance.

d) 气体检测。应进行持续有效地通风换气，空气检测前，应停止对封闭处所的通风，在环境状态稳定后进行测定。 Gas detection. Continuous and effective ventilation should be carried out. Before air detection, ventilation in enclosed areas should be stopped, and measurements should be taken after the environmental conditions have stabilized.

e) 通讯及救援设备检查。进入封闭处所作业前，作业人员应检查确认安全防护设备用品有效。 Inspection of communication and rescue equipment. Before entering a closed spaces for work, the operator should check and confirm that the safety protection equipment and supplies are effective.

f) 进入许可。填写《封闭处所进入许可证》，报船长或指定负责人审批。 Entry permit. Fill out the 'Closed Area Entry Permit' and submit it to the Captain or designated person in charge for approval.

g) 作业执行。得到批准后，作业人员进入封闭处所进行作业，监护人员始终不应离开出入口外，应随时按规定的通信方式与作业人员取得联系。 Work execution. After obtaining approval, the operators enter the enclosed area for work, and the supervisors should never leave the entrance and exit. They should always contact the operators according to the prescribed communication methods.

h) 作业中断或暂停。作业人员进入封闭处所后以及在临时休息期间，应持续对封闭处所进行通风换气。临时休息或中断作业后再次进入封闭处所前，应重新对空气质量进行检测。 Interruption or pause of work. After entering the enclosed spaces and during temporary rest periods, the operators should continue to ventilate and exchange air in the enclosed area. Before entering a closed area again after taking a temporary break or interrupting work, the air quality should be retested.

i) 作业结束。作业结束后，清点人数，并锁闭封闭处所。 The work is over. After the work is completed, count the number of people and lock the enclosed spaces.

## ● 船舶自查重点项目 Key items for ship self inspection

a) 自查《进入封闭处所作业的安全操作程序》、《进入封闭处所的安全培训程序》等船舶安全体系文件是否编制齐全并有效实施。Self Check whether the ship safety system documents such as "Safety Operation Procedures for Entering Closed Spaces" and "Safety Training Procedures for Entering Closed Spaces" are fully prepared and effectively implemented.

b) 船员是否熟记封闭处所操作流程。Are the crew members familiar with the operating procedures for enclosed spaces.

c) 自查船舶封闭处所清单。船舶是否有完整的封闭处所清单，并与实船相符。Self inspection of the list of enclosed spaces on ships. Does the vessel have a complete list of enclosed spaces that match the actual vessel.

d) 自查所有进入封闭处所的演习、培训记及风险评估等记录。演习至少每两个月做一次，演习图片不能重复，每次演习需对应有风险评估、封闭处所进入许可记录。Conduct a self inspection of all drill, training records, and risk assessment records related to entering enclosed spaces. The drill should be conducted at least once every two months, and the drill pictures cannot be repeated. Each drill should correspond to a risk assessment and a record of entry permits for enclosed spaces.

e) 保证呼吸器、个人保护设备、测氧仪、通风机、担架等救助设备随时可用。Ensure that rescue equipment such as respirators, personal protective equipment, oxygen meters, ventilators, stretchers, etc. are always available.

f) 通风设备状态是否良好。排查风机，通风管道气密性，开关及标识（机械通风）；排查风机挡板，关闭装置等（自然通风）。Is the ventilation equipment in good condition. Check the air tightness, switches, and labeling of fans and ventilation ducts (mechanical ventilation); Check the fan baffle, closing device, etc. (natural ventilation).

g) 封闭处所入口。门、人孔、通道等开口状态是否良好（尺寸、关闭装置等）；对无需进入的封闭处所，出入口应锁闭，对无法锁闭的应设置警示标识。The entrance of the enclosed spaces. Whether the opening status of doors, manholes, passages, etc. is good (size, closing devices, etc.); For enclosed spaces that do not require entry, entrances and exits should be locked, and warning signs should be set up for areas that cannot be locked.

h) 封闭处所内部设施设备是否完好。梯道状态是否完好；封闭处所内照明（如有）是否适用；封闭处所内水位探测器（如有）是否正常。Whether the internal facilities and equipment of the enclosed spaces are in good condition. Is the

staircase in good condition; Is the lighting inside the enclosed spaces (if any) applicable; Is the water level detector (if any) in the enclosed spaces functioning properly.

## ● 典型缺陷列表 Typical Deficiency List

(1) 0860/18415 船舶不能提供封闭处所清单 The vessel cannot provide a list of enclosed spaces

(2) 0860/18415 船舶未制定应急救助预案 The vessel has not formulated an emergency rescue plan

(3) 2099/04118 船舶超过2个月未进行进入封闭处所演习或进入封闭处所演习记录显示承担进入封闭处所应急职责的船员未参与演习 The vessel has not conducted any drills for entering enclosed spaces for more than 2 months, or the records of the drills show that crew members responsible for emergency entry into enclosed spaces did not participate in the drills

(4) 0860/18415 进入封闭处所前的通风、气体检测记录未见 No ventilation or gas detection records were found before entering the enclosed spaces

(5) 0745/07116 通风系统故障 Ventilation system malfunction

(6) 0860/06105 船舶未配备气体检测设备；气体检测设备过期或失效；检测设备未能定期校验或已损坏，无法提供准确的气体浓度读数 The vessel is not equipped with gas detection equipment; Expired or ineffective gas detection equipment; The detection equipment has not been regularly calibrated or is damaged, making it impossible to provide accurate gas concentration readings

(7) 0810/18412 应急和个人防护装备缺失、过期或损坏，无法在紧急情况下使用 Emergency and personal protective equipment is missing, expired, or damaged, and cannot be used in emergency situations

(8) 0899/18415 船舶未配备进入封闭处所的通信、救助设备或设备故障 The vessel is not equipped with communication and rescue equipment for entering enclosed spaces or equipment malfunctions

(9) 0860/18415 进入封闭处所的通道损坏或被堵塞 The passage into the enclosed spaces is damaged or blocked

(10) 2530/10136 作业人员应急情况下不能进行有效的语言交流 Operators are unable to engage in effective language communication in emergency situations

(11) 0899/18415 作业人员不熟悉封闭处所的相关风险和安全进入封闭处所的船上程序 The operators are not familiar with the relevant risks and safety procedures for entering enclosed spaces on board

(12) 2099/18415 适任人员、责任人员和负责封闭处所气体检测的船员不熟悉封闭处所气体检测仪器操作程序（检查、测试、校正等） The competent personnel, responsible personnel, and crew members responsible for gas detection in enclosed spaces are not familiar with the operating procedures of gas detection instruments in enclosed spaces (inspection, testing, calibration, etc.)

(13) 0810/18415 适任人员、责任人员和具有封闭处所进入或救助职责的船员不熟悉安全防护设备与用品的检查、使用和维护常识 The competent personnel, responsible personnel, and crew members with enclosed entry or rescue responsibilities are not familiar with the inspection, use, and maintenance of safety protection equipment and supplies

(14) 0899/18415 适任人员不熟悉进入封闭处所的初步风险评估 The competent personnel are not familiar with the preliminary risk assessment of entering enclosed spaces

(15) 0899/18415 在实施作业的封闭处所入口处未配备必要的救助和急救设备 Necessary rescue and first aid equipment is not equipped at the entrance of the enclosed spaces where the operation is being carried out

(16) 2099/04118 担任救援和急救职责的船员未掌握救援和急救程序 The crew members responsible for rescue and first aid have not mastered the rescue and first aid procedures

(17) 2535/15106 缺陷 “ (序号) ” .....表明，体系文件在船上的实施不能有效保证船舶操作符合强制性规定和标准的要求 Defect "(serial number)" indicates that the implementation of system documents on board cannot effectively ensure that ship operations comply with mandatory regulations and standards.

以上内容仅为参考，建议各船东/船管/船舶根据中国海事局该专项治理行动内容，认真开展自查，提升船舶安全管理水平，防范和遏制事故的发生。The above content is for reference only. It is recommended that all Shipowners/Managers/vessels carefully conduct self inspections based on the content of the special governance action of MSA to improve the level of ship safety management and prevent and curd the occurrence of accidents.

如有任何疑问，请发送邮件到 [technical@fsclass.org](mailto:technical@fsclass.org)。

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