

Subject

Instructions by the Administration of Germany regarding  
Guidance on Providing Safe Working Conditions for  
Securing of Containers on Deck  
(CSS Code Annex 14)

# **ClassNK**

## ***Technical Information***

No. TEC-1155  
Date 15 June 2018

To whom it may concern

1. General

The Administration of Germany has issued instructions regarding the application of MSC.1/Circ.1352/Rev.1 (CSS Code Annex 14) as the attached ISM-Circular No. 03/2011.

According to the instruction, CSS Code Annex 14 is to be applied as a mandatory requirement to German flagged containerhips as described below.

2. Application of the CSS Code, Annex 14

- Containerhips with a date of keel laying (or which are at a similar stage of construction) on or after 1 January 2015 are subject to the provisions of Annex 14.
- Existing containerhips with a date of keel laying prior to 1 January 2015 are subject to the provisions of sections 4.4, 7.1, 7.3, and 8 in Annex 14; and
- Existing containerhips are subject to the provisions of sections 6 and 7.2 in Annex 14, as far as practical, with the understanding that existing ships would not be required to be enlarged or undergo other major structural modification as determined by the Administration.

3. Instructions from other flag Administrations regarding the application of the CSS Code, Annex 14 are available on the ClassNK website under the category of "Ship Type: Container" on the search page for ClassNK Technical Information.

Please be advised that new ClassNK Technical Information circulars will be issued upon receipt of instructions from flag states other than the above.

(To be continued)

NOTES:

- ClassNK Technical Information is provided only for the purpose of supplying current information to its readers.
- ClassNK, its officers, employees and agents or sub-contractors do not warrant the accuracy of the information contained herein and are not liable for any loss, damage or expense sustained whatsoever by any person caused by use of or reliance on this information.
- Back numbers are available on ClassNK Internet Homepage (URL: [www.classnk.or.jp](http://www.classnk.or.jp)).

For any questions about the above, please contact:

[For the latest information on instructions issued by each flag state]

NIPPON KAIJI KYOKAI (ClassNK)

External Affairs Department, Administration Center Annex, Head Office

Address: 3-3 Kioi-cho, Chiyoda-ku, Tokyo 102-0094, Japan

Tel.: +81-3-5226-2038

Fax: +81-3-5226-2734

E-mail: xad@classnk.or.jp

[For questions on technical aspects of the Technical Information]

Hull Department, Administration Center Annex, Head Office

Address: 3-3 Kioi-cho, Chiyoda-ku, Tokyo 102-0094, Japan

Tel.: +81-3-5226-2017 / 2018

Fax: +81-3-5226-2019

E-mail: hld@classnk.or.jp

Attachment:

1. ISM-Circular No. 03/2011



# Dienststelle Schiffssicherheit BG Verkehr

ISM-Circular No.: 03/2011

**Subject:** Guidance on providing safe working conditions for securing of containers

**Rule reference:**

- ISM Code 1.2.3; 6.5; 7
- CSS Code ANNEX 14
- MSC. 1/Circ. 1352, MSC. 1/Circ. 1353, MSC.1/Circ.1263
- ISM Info Mail 01/2011

**Remark:** This circular needs to be carried on board of ships which are specifically designed and fitted for the purpose of carrying containers on deck.

**Date:** 18.05.2011

## Preamble

This circular informs ship owners, ship managers, designated persons and masters of German flagged ships about important amendments to the Code of Safe Practice for Cargo Stowage and Securing (CSS-Code). The aim of the new annex 14 to the CSS Code (MSC. 1/Circ. 1352) is to ensure that persons engaged in carrying out container securing operations on deck have safe working conditions and, in particular safe access, appropriate securing equipment and safe places of work.

Injuries to dockworkers on board visiting ships account for the majority of accidents that occur within container ports, with the most common activity that involves such injuries being the lashing/unlashing of deck containers. Ships' crew engaged in securing operations face similar dangers.

## Scope

The new annex 14 to the CSS Code applies to containerships, the keels of which were laid or which are at a similar stage of construction on or after 1 January 2015. On existing containerships the following sections of ANNEX 14 have to be applied:

- 4.4 (Training and familiarization)
- 6 (Design)
- 7.1 (Introduction)
- 7.2 (Operation procedures)
- 7.3 (Maintenance)
- 8 (Specialized container safety design)

With regard to section 6 (Design) and section 7.2 (Operation procedures) existing ships are not be required to be enlarged or undergo other major structural modifications.

## **Revised Recommendations on safety of personnel during container securing operations (MSC.1/Circ.1263)**

Ship owners, ship designers and Administrations should take into account the recommendations on safe design of securing arrangements contained in annex 14 CSS Code, and in the Recommendations on safety of personnel during container securing operations (MSC.1/Circ.1263).

### **Cargo Safe Access Plan (CSAP)**

The revised Guidelines for the preparation of the Cargo Securing Manual (MSC.1/Circ.1353) requires ships constructed on or after 1 January 2015 and which are specifically designed and fitted for the purpose of carrying containers to have an approved Cargo Safe Access Plan (CSAP) on board, for all areas where containers are secured.

Stakeholders, including, but not limited to shipowners, ship designers, ship builders, administrations, classification societies and lashing equipment manufacturers, should be involved at an early stage in the design of securing arrangements on containerships and in the development of the CSAP.

The CSAP should be developed at the design stage in accordance with chapter 5 of the annex to MSC.1/Circ.1353.

### **Training and familiarization**

Personnel engaged in cargo securing operations on container ships should be familiarized with the ship's unique characteristics, lashing equipment and potential hazards arising from such operations necessary to carry out their duties.

### **Operational and maintenance Procedures**

Procedures for safe lashing and securing operations are to be included in the ship's Safety Management System (SMS). In particular, the following points of section 7 of annex 14 to the CSS Code are to be considered:

1. Transit areas should be safe and clear of cargo and all equipment
2. Openings that are necessary for the operation of the ship, which are not protected by fencing, should be closed during cargo securing work. Any necessarily unprotected openings in work platforms, and gaps and apertures on deck should be properly highlighted.
3. The use of fencing is essential to prevent falls. When openings in safety barriers are necessary to allow container crane movements, particularly with derricking cranes, removable fencing should be used whenever possible.
4. It should be taken into account that when lifting lashing bars that can weigh between 11 and 21 kg and turnbuckles between 16 and 23 kg, there may be a risk of injury and severe illness as a result of physical strain if handled above shoulder height with the arms extended. It is therefore recommended that personnel work in pairs to reduce the individual workload in securing the lashing gear.
5. The company involved with cargo operation should anticipate, identify, evaluate and control hazards and take appropriate measures to eliminate or minimize potential hazards to prevent in particular with harmful lumbar spinal damage and severe illness as a result of physical strain.
6. Personnel engaged in containership cargo operations should wear appropriate Personnel Protective Equipment (PPE) whilst carrying out lashing operations. The PPE should be provided by the company.
7. Manual twistlocks should only be used where safe access is provided.
8. Containers should not be stowed in spaces configured for larger sized containers unless they can be secured under safe working conditions.

9. When work on container tops can not be avoided, safe means of access should be provided by the container cargo operation terminal, unless the ship has appropriate means of access in accordance with the CSAP.
10. Recommended practice involves the use of a safety cage lifted by a spreader to minimize the risk to personnel.
11. A safe method of work should be developed and implemented to ensure the safety of lashers when on the top of container stows on deck. Where practical, the use of fall prevention equipment should take precedence over fall arrest equipment.
12. In line with section 2.3 (Inspection and maintenance schemes) of the revised Guidelines for the preparation of the cargo securing manual (MSC.1/Circ.1353) all ships should maintain a record book, which should contain the procedures for accepting, maintaining and repairing or rejecting of cargo securing devices. The record book should also contain a record of inspections.
13. Lighting should be properly maintained.
14. Walkways, ladders, stairways and fencings should be subject to a periodic maintenance programme which will reduce/prevent corrosion and prevent subsequent collapse.

**Action required:**

Companies concerned are requested to take note of and to implement this circular and to inform their masters accordingly.

Copies of the ISM Circular and the MSC Circulars can be found at our website:

<http://www.bg-verkehr.de/service/downloads/ship-safety-division/ism/overview-ism-circulars-and-ism-info-mails>

**Contact:**

Dienststelle Schiffssicherheit

BG-Verkehr

Referat ISM/ILO

Telephone: 040 / 36 137-213

Telefax: 040 / 36 137-295

eMail: [ism@bg-verkehr.de](mailto:ism@bg-verkehr.de)

[www.dienststelle-schiffssicherheit.de](http://www.dienststelle-schiffssicherheit.de)