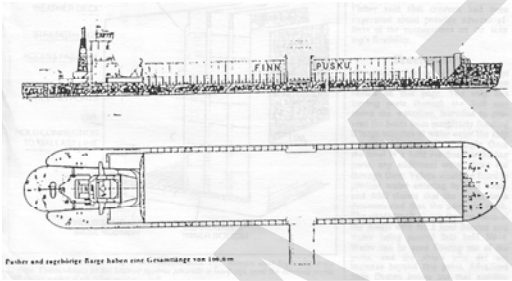
1. **Subject:** Enclosed Space Definition: Deck Above Required to Bound Enclosed Space?

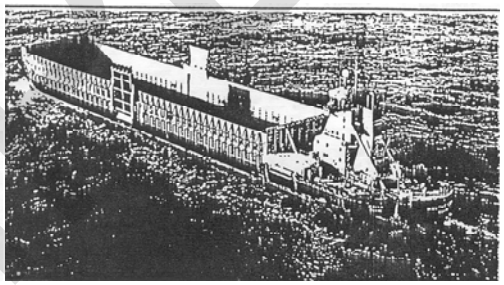
2. **Text from TM Convention or TM.5/Circ.5**

   TM Convention Reg 2(4): "Enclosed spaces are all those spaces which are bounded by the ship's hull, by fixed or portable partitions or bulkheads, by decks or coverings other than permanent or movable awnings. No break in a deck, nor any opening in the ship's hull, in a deck or in a covering of a space, or in the partitions or bulkheads of a space, nor the absence of a partition or bulkhead, shall preclude a space from being included in the enclosed space."

3. **Brief Description of Issue**

   Reg 2(4) is unclear as to whether – in order for a space to be considered enclosed and therefore included in V – a space not within the vessel's hull must be bounded by a deck above. The issue was discussed at SLF 30 (SLF 30 / WP 4), and a decision made that a deck above was required to bound an enclosed space, although there was not universal agreement on this interpretation. In theory, under this interpretation, the space bounded by the high coamings is not enclosed. Subsequently, IMO has taken different approaches, with volumes inside coamings of open-top containerships included in V, while volumes inside of coamings of dockships have been omitted.





4. **Estimate of number of vessels potentially affected in world fleet.**

   Small _X_ (< 30%) Moderate ____ (30% - 70%) Large____ (> 70%) No Opinion / ____ Don't Know

5. **Estimate of potential impact on gross/net tonnage assignments of affected vessels.**

   Low ____ <10% GT/NT Moderate ____ 10%-30% GT/NT Large _X_ > 30% GT/NT No Opinion / ____ Don't Know

6. **Opinion on need to amend TM Convention to address.**

   Not Needed ____ Possibly Needed_X_ Needed ____ No Opinion / ____ Don't Know

7. **Opinion on effect on ship design / safety / crew accommodation if unresolved.**

   Little Effect____ Moderate Effect____ Large effect_X_ No Opinion / ____ Don't Know

8. **Opinion on overall importance of resolving issue to ensure uniform application/integrity.**

   Low ____ Moderate ____ High_X_ No Opinion / ____ Don't Know

Tonnage CG Participant Name: ___John Doe_____ **Date** __17 Mar 2010___

SAMPLE