

5 November 2007

NMSC Secretariat
Level 5, 9-13 Young Street
Sydney NSW 2000

Issues Paper for Public Comment: National Standard for Commercial Vessels Review of Part D Crew Competencies

On behalf of the Tasmanian seafood industry the Tasmanian Fishing Industry Council welcomes the opportunity to comment on the Review of Part D Crew Competencies. In general the Tasmanian seafood industry supports the move to competency based assessment for the purpose of issuing a certificate for the operation of commercial vessels.

Our specific comments on the issues outline in the paper are provided below. Our comments relate exclusively to fishing and aquaculture operations.

5.1 Current Certification Structure

5.1.a & c

We support the retention of the current structure that is in place in Tasmania for coxswain certificates. Particularly for the aquaculture industry the retention of a Restricted Coxswains certificate, which limits the area of operation to sheltered waters is essential for vessels under 12 meters.

- Consideration should be given to increasing the upper limit for a Masters V certificate to 25 meters.
- The upper power limit for an MED III certificate should be increased to 750kW. The Issues Paper acknowledges that there have been significant advances to marine diesel engines over the last 10 to 15 years with the same technology being used for marine diesel engines from low powered to high powered engines. In addition, particularly for planning hull vessels the horse power in < 24 meter vessels has increased significantly.

5.2 Engineering

5.2 b & c

The comments above dot point 2 apply. In reality on fishing vessels only a limited range of repairs can be affected at sea irrespective of the size of the vessel. Therefore any upper limit on marine diesel engines is indeed arbitrary.

The fishing industry is aware of the need to maintain the distinction between operators of high speed diesels and medium speed diesels in relation to engineering requirements. This separation would assist

in allowing a more realistic link between the horse power used in fishing vessels and the operating environment.

5.3 Medical

5.3 b & c

The Tasmanian seafood industry would not support the imposition of a revised standard as per AMSA or the National Transport Commission Standard as we believe these standards are not applicable to our industry.

The present requirements in relation to the acceptable level of deficiency in colour vision should be revised. The number of accidents involving fishing vessels as a result of collisions between vessels at night has been minimal. In addition the high incidence of colour deficiency amongst Australian males should be considered. The age old argument remains unanswered if being colour deficient is not a barrier to an individual holding a license to drive a motor vehicle why should it apply to the operator of a fishing vessel?

5.4 Sea Time

5.4 a

We strongly believe that the current quantitative (time based) requirements for certificates are excessive. Consideration should be given to demonstrating verified employment within the fishing / aquaculture industries for two years with a much reduced actual sea time requirement. With a competency based assessment approach safety should not be compromised if the appropriate weighting is given to demonstrating competency in relation to on-board safety.

To draw a parallel, a commercial pilot has to have completed 200hrs of supervised training before they can be registered to fly with passengers, will a fisher must have 900 verified days at sea before they can be issued with a Masters certificate. This is a totally inequitable situation. For example a rock lobster vessel in Tasmanian is at sea for between 80 and 150 days a year. Given the best case scenario it would mean a crew would have to spend 6 years at sea before qualifying for a Masters certificate.

5.6 Revalidation/Renewal

5.6 a

The Tasmanian seafood industry is totally opposed to the revalidation of certificates of competency. We do not accept that an individual should have to provide evidence that they had completed 12 months of service in each 5 year period.

5.7 Oral Examination

5.7

The Tasmanian fishing industry wishes to see the requirement for an oral examination for certificates of competency removed. The oral examinations are only a duplication of the written examinations and as such are an unwarranted condition on the granting of a certificate.

5.8.1 Fishing Industry

5.8.1 a & b

TFIC believes that the 200nm limit on Master 5/Skipper Grade 3 should be extended without any change in competency. The general perception of the fishing industry is that safety issues are of more concern in near shore coastal waters than on the high seas.

As the vast majority of Australian's fishing industry operates in near shore coastal waters where the length of voyage is usually of a short duration there is not a need for GPHs with formal watch keeping qualifications. This would only place an additional burden on the industry for no demonstrable long term benefit.

5.13 Minimum/Adequate Crewing

5.13 a

The Tasmanian seafood industry does not support an increase in the minimum manning level for vessels < 12 metres in inshore and offshore waters. We believe that safety concerns have been overstated.

An additional issue is the mismatch between survey and manning requirements for 24 and 25 metre vessels these should be synchronised so that a Masters 5 certificate is the qualification required for those operating vessels between 12 and 25 metres and a manning level is set at a Master/Skipper and 2 crew within specified waters i.e. out to at least 200nm.

Yours truly,



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CHIEF EXECUTIVE