



Australian Government

**Department of Infrastructure, Transport,
Regional Development and Local Government**

File Reference: 08/7814

Mr Michael Crawford
Committee Secretariat
Standing Committee on ITRDLG
PO Box 6021
Parliament House
CANBERRA ACT 2600

Dear Mr Crawford

Departmental officers attended the public hearing on 16 May 2008 and undertook to provide responses at a later date to a number of questions posed by the Committee.

I have also provided a correction to the Department's submission at Attachment B. Attachment B actually refers to Attachment H in the submission (page 129). It would be appreciated if you could substitute this page with the corrected Attachment H.

In addition, please find at Attachment C a supplementary submission in relation to AMSA's training provisions.

Please find below the information sought by the Committee.

Query 1

CHAIR—I could have it wrong, but my understanding from memory, from reading a submission, is that there actually has been a review of the Navigation Act and there are recommendations sitting somewhere on a shelf. Is that correct?

Mr Kinley—Yes.

CHAIR—Have you got access to that that we can have?

Mr Wilson—The department and AMSA have done an internal review of the act. I would have to check with my minister."

Response:

The Departmental review of the *Navigation Act 1912*, known as the Taylor Review, was completed in 2000. The Committee can access this report at:

http://www.infrastructure.gov.au/maritime/publications/pdf/maritime_navactfinatreport.pdf

and I have attached a copy of this letter at Attachment D. This has been the only Departmental review of the Navigation Act completed in recent years.

Query 2

“Dr Stone: These are all foreign ships, yes. But Australian licensed ships are subject to the same inspections and regime, presumably?”

Response:

In relation to the comparison between the ship inspection record for AMSA’s port State control program for foreign flag vessels visiting Australian ports and its flag State control program for Australian flag ships, the table below shows the comparison of statistics for the number of ship inspections, deficiencies, and detentions for the calendar years 2002 to 2007.

While Australian flag ships show a slightly higher rate of deficiencies per inspection than foreign flag ships, the detention rate for major safety and environmental deficiencies is much less than for foreign flag ships.

| Year | Port State Control for Foreign Flag Ships | | | Flag State Control for Australian Flag Ships | | |
|------|---|------------------------------------|---------------------------------|--|------------------------------------|---------------------------------|
| | Total Inspections | Deficiencies (Rate per inspection) | Detained ships (Detention Rate) | Total Inspections | Deficiencies (Rate per Inspection) | Detained ships (Detention Rate) |
| 2002 | 2842 | 7550 (2.7) | 166 (5.8%) | 85 | 177 (2.1) | 1 (1.2%) |
| 2003 | 2827 | 6889 (2.4) | 191 (6.9%) | 93 | 274 (2.9) | 3 (3.2%) |
| 2004 | 3201 | 7512 (2.3) | 177 (5.5%) | 95 | 268 (2.8) | 1 (1.1%) |
| 2005 | 3072 | 8007 (2.6) | 154 (5%) | 111 | 311 (2.8) | 0 |
| 2006 | 3080 | 8971 (2.9) | 138 (4.5%) | 94 | 328 (3.5) | 1 (1.1%) |
| 2007 | 2963 | 7291 (2.5) | 159 (5.4%) | 99 | 387 (3.9) | 3 (3%) |

Query 3

“CHAIR—To follow up on Dr Stone’s question, certainly when I have been involved in aviation security inquiries, the department has been very good in providing us with a list of recent incidents that we should be aware of. I think we have taken that evidence in camera. Is it possible for you to provide us with a list of some of the recent incidents that you have been investigating, please?

Mr Kinley—For clarification, are you interested in ship detentions, OH&S incidents on Australian ships, pollution—all incidents?

CHAIR—Yes, that would be helpful. It would be good to have it as soon as possible.

Dr STONE—What about over the period back to 2002?

CHAIR—If that is possible, that would be helpful.”

Response:

SHIP INSPECTION DETAINABLE DEFICIENCIES

AMSA publishes an annual report analysing the results of its ship inspection programs, which details the type of deficiencies encountered each calendar year, particularly those that lead to detention of ships as being unseaworthy or substandard because of major safety and environment protection deficiencies. These reports are available on AMSA's Internet site at: http://www.amsa.gov.au/Shipping_Safety/Port_State_Control/PSC_Annual_reports.asp

Attachment A provides a profile of the most common categories of detainable deficiencies in a comparison between 2006 and 2007 and for the years 2002 to 2007, including a chart showing the changing proportions of each category over these six years.

The first table summarises the detainable deficiencies by category in the past two calendar years. It shows the main deficiency category in both 2006 and 2007 was fire safety measures, in particular inoperable engine room fire dampers due to wastage and other defects. These represented 32% of detainable deficiencies in 2007 and 27.5% in 2006.

The second most common category is life saving appliances (17%), including defects in the safety of lifeboat launching arrangements. The third category covers lack of compliance with the International Convention on Load Lines (12%), including overloading of ships and defects in fittings essential to the maintenance of the external weathertight and watertight integrity of the ship.

Then follows the radio communications category (9%) and a ship's safety management system being non-compliant with the International Safety Management (ISM) Code (8%). Deficiencies in relation to ship stability, structure and related equipment significantly declined from representing almost 16% in 2006 down to under 8% of the total detainable deficiencies in 2007.

Compliance with the International Convention on Prevention of Pollution by Ships (the MARPOL Convention) is the next category (5.5%) and this relates to equipment deficiencies, usually associated with malfunctioning of the ship's oily water separator, and operational deficiencies in relation to the maintenance of a ship's oil and garbage record books. Similarly, the next category covers operational deficiencies related to compliance with the SOLAS Convention (3.5%) and the final categories registering less than 2% are machinery and electrical installations (1.5%), seafarer certification and watchkeeping practices (1%), ship's certificates and documents (1%), as required under the SOLAS, MARPOL and Loadline Conventions, and carriage of cargo and dangerous goods (0.7%).

OCCUPATIONAL HEALTH AND SAFETY

AMSA performs the occupational health and safety Inspectorate function under the *Occupational Health and Safety (Maritime Industry) Act 1993*. AMSA marine surveyors are specially trained in the requirements of the Act and occupational health and safety hazard management. They perform a range of functions including: investigations of accidents and dangerous occurrences; issuing of prohibition and improvement notices; and advising employers on their duty of care as well as on approaches to safety and effective injury prevention. The table below summarises AMSA occupational health and safety activity:

AMSA's Occupational Health and Safety Inspectorate Activity

| Year | 2002-03 | 2003-04 | 2004-05 | 2005-06 | 2006-07 |
|--|---------|---------|---------|---------|---------|
| Incidents reported to AMSA * | 79 | 78 | 49 | 51 | 65 |
| Dangerous occurrences notified # | 13 | 6 | 2 | 1 | 10 |
| Incidents minus dangerous occurrences | 66 | 72 | 47 | 50 | 55 |
| Investigations under s87 in relation to compliance with or contravention of Act or regulations; accidents and dangerous occurrences. | 12 | 10 | 45 | 49 | 38 |
| Prohibition Notices issued under s93 | 2 | 1 | 9 | 6 | 4 |
| Improvement Notices issued under s98 | 0 | 1 | 6 | 19 | 17 |
| Directions given s92 | 0 | 0 | 1 | 0 | 0 |
| Appeals instituted against inspectors' decision s100 | 0 | 0 | 0 | 0 | 0 |
| Prosecutions commenced | 0 | 0 | 1 | 1 | 2 |
| Prosecutions completed 0 | 0 | 0 | 0 | 1 | 2 |

* Incidents reported to AMSA include where the employee is incapacitated for five or more successive working days; where the employee sustains a serious personal injury; death or a dangerous occurrence.

A dangerous occurrence is where there is an incident at the workplace that resulted from operations arising from an undertaking conducted by or for the operator of the workplace and could have caused death or serious personal injury or incapacity of an employee for five or more working days.

The table below shows the ratio of reported incidents to the total of number of seafarers covered by the *Occupational Health and Safety (Maritime Industry) Act 1993*:

| YEAR | 2002-03 | 2003-04 | 2004-05 | 2005-06 | 2006-07 |
|--|---------|---------|---------|---------|---------|
| Number of incidents | 79 | 78 | 49 | 51 | 65 |
| Number of seafarers (FTE) under the OHS(MI) Act | 3173 | 3474 | 3371 | 3426 | 3351 |
| Ratio (incidents per 1000 seafarers) | 24.9 | 22.5 | 14.5 | 14.9 | 19.4 |
| Number of reported incidents involving an incapacity of 5 or more days | 65 | 72 | 47 | 50 | 55 |
| Ratio (incidents involving 5 or more days incapacity per 1000 seafarers) | 20.5 | 20.7 | 13.9 | 14.6 | 16.4 |

The table shows that the reported incident ratio in 2006-07, measured using all incidents reported to AMSA as a proportion of seafarers covered by the Act, was consistent with the average over the past five years. The incident rate for 2006-07 based on reported incidents resulting in incapacity of five or more successive days is below the five-year average.

SHIP SOURCED POLLUTION INCIDENTS

AMSA manages the National Plan to Combat Pollution of the Sea by Oil and Other Noxious and Hazardous Substances, which involves providing oil and chemical spill preparedness and response capabilities in consultation with State/Northern Territory Governments, ports, shipping, oil, exploration and chemical industries and emergency services.

Under the National Plan arrangements, AMSA maintains a marine pollution database, which uses the following definitions:

- 'Oil discharges' refers to any discharges or suspected operational discharges of oil from a vessel or vessels in excess of the permitted discharge rate under the MARPOL Convention (generally 15 parts per million oil in water).
- 'Oil spills' refers to accidental spills resulting from incidents such as groundings or collisions as well as spills during bunkering resulting from overflow of tanks, burst hoses, etc.

AMSA receives information from the following sources:

- Oil discharge reports received by AMSA including reports from aircraft (Coastwatch, RAAF and civilian) as well as from vessels at sea;
- Records of National Plan expenditure in responding to oil spills;
- Incident reports submitted by State/Northern Territory authorities; and
- Reports from other sources (eg Australian Government agencies, industry, the public).

About a quarter of the reports received by AMSA are not entered onto the database where the sighting is, or is strongly suspected to be, one of the following:

- Land sourced, including tank farms, road tanker accidents, drains or road runoff after heavy rain (unless some response activity is required and/or National Plan response costs are incurred);
- Coral spawn or marine algae or similar occurrence, taking into account the location of the report and the time of the year;
- Discoloured water with no sheen;
- Washings of coal dust from bulk carriers; or
- Discharge from a sewage outfall.

The table below shows the oil pollution statistics from 2002-2003 to 2006-2007:

| YEAR | 2002-03 | 2003-04 | 2004-05 | 2005-06 | 2006-07 |
|---|---------|---------|---------|---------|---------|
| Number of Oil discharge sightings | 300 | 322 | 288 | 227 | 174 |
| Number of oil spill incidents requiring National Plan response* | 77 | 118 | 172 | 106 | 82 |
| Sources of Reported Oil Spills: | | | | | |
| - Unknown | 45% | 42% | 55% | 46% | 33% |
| - Ship | 39% | 40% | 33% | 41% | 57% |
| - Shore based | 13% | 17% | 9% | 11% | 6% |
| - Exploration | 2% | 1% | 1% | 2% | 4% |
| - Other | 1% | - | 2% | - | - |

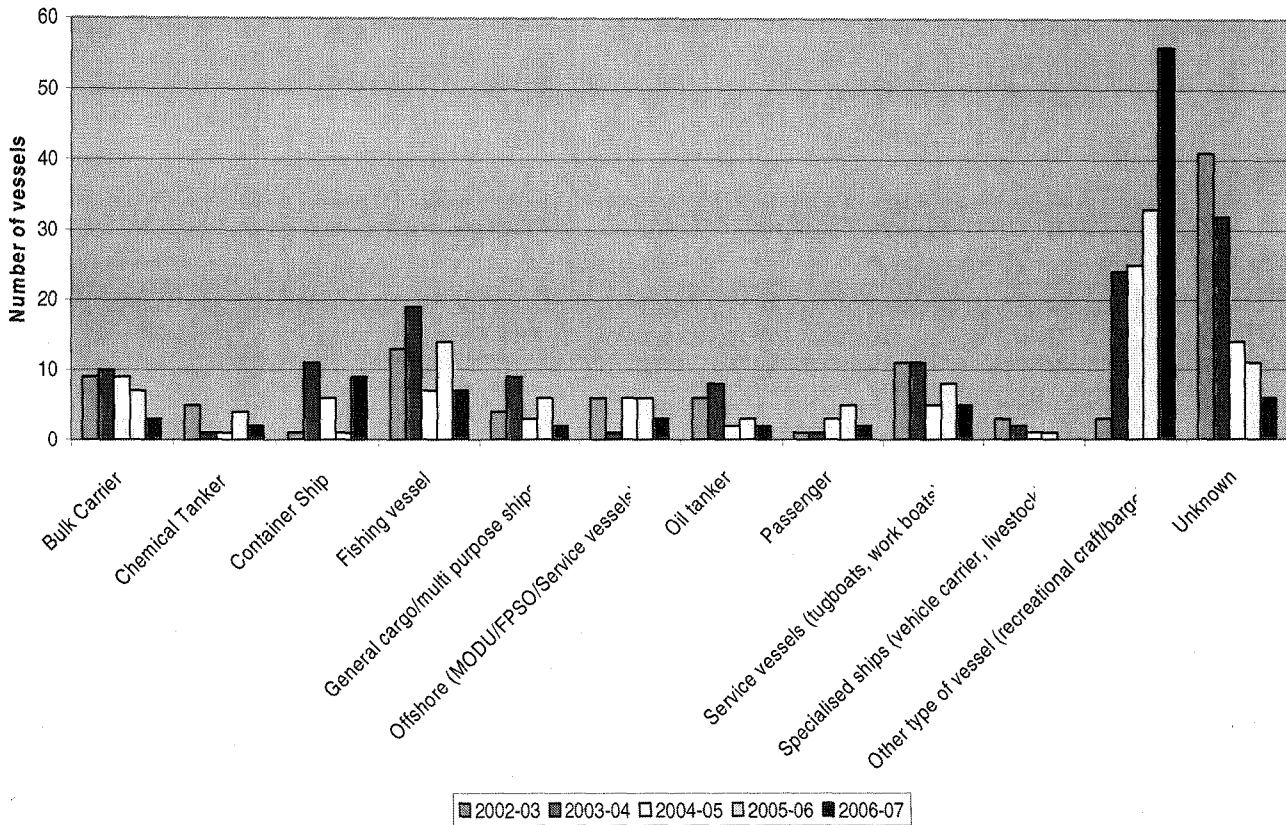
* The National Plan response can range from simply advising relevant stakeholders and seeking further information to full mobilisation of response personnel and equipment.

It will be noted that while the number of oil discharge sightings has declined over the five years, the proportion of oil spills attributable to ships has grown, which may reflect the increased sophistication of oil identification techniques and ship tracking technology, including satellite based systems.

In relation to the ship-sourced oil discharges, the table and chart below shows the different types of vessels involved:

| YEAR | 2002-03 | 2003-04 | 2004-05 | 2005-06 | 2006-07 |
|---|---------|---------|---------|---------|---------|
| Bulk Carrier | 9 | 10 | 9 | 7 | 3 |
| Chemical Tanker | 5 | 1 | 1 | 4 | 2 |
| Container Ship | 1 | 11 | 6 | 1 | 9 |
| Fishing vessel | 13 | 19 | 7 | 14 | 7 |
| General Cargo/multi purpose | 4 | 9 | 3 | 6 | 2 |
| Offshore (MODU/FPSO/Service vessels) | 6 | 1 | 6 | 6 | 3 |
| Oil tanker | 6 | 8 | 2 | 3 | 2 |
| Passenger | 1 | 1 | 3 | 5 | 2 |
| Service vessels (tugboats, work boats) | 11 | 11 | 5 | 8 | 5 |
| Specialised ships (vehicle carrier, livestock) | 3 | 2 | 1 | 1 | - |
| Other type of vessel (recreational craft/barge) | 3 | 24 | 25 | 33 | 56 |
| Unknown | 41 | 32 | 14 | 11 | 6 |

Oil Discharges by Vessel Type



Query 4

Mr SULLIVAN—My third one is much briefer. I was interested in the chart ‘Supply of Australian officers and ratings 1990-2005’ on page 37 of your submission and page 107 of our briefing notes. It just seems to me to be an extraordinary growth in the number of Australian officers and ratings. I note that there are some disclaimers, but in the last five years, according to this, we have gone from under 2,000 officers to nearly 5,000 and from about 2½ thousand ratings to about 3,200. I am just wondering where all these people are working.

Mr Wilson—If you would not mind, we will take it on notice and get back to you.”

Response:

The figures provided in the Department’s submission were sourced from the BIMCO/ISF Maritime Skills Availability Studies 1995-2005 and provides the only periodic figures available to the Department.

AMSA’s Maritime Skills Availability Study suggests that there needs to be a distinction between ‘qualified’ and ‘active’ seafarers in quantifying the maritime skills base in Australia. Significant growth in certain countries documented in the BIMCO/ISF Studies can be attributed to improved reporting techniques and greater participation and accuracy from the data collection sources.

Query 5

“Mr Wilson—Chair, if I could clarify a point. Mr Clare asked before about any Western Australian restriction with regard to ammonium nitrate. Mr Kinley has found in the Seacorp submission, which is submission No. 2, a reference to it which indicates there is a restriction with regard to the amount of ammonium nitrate allowed within the Fremantle inner harbour and at the Kwinana bulk jetty, as well as the ports of Dampier and Port Hedland. They would be port restrictions rather than Australian government restrictions. I will take the question away and make certain that that is the case. So that would be Western Australian port authority restriction rather than a Commonwealth government restriction. It would not be a limitation on the ship itself. I will take it away and clarify it.”

Response:

Given the intra-state nature of these voyages, from Fremantle to Dampier, Port Hedland and Kwinana, the responsibility for imposing restrictions falls beyond the control of the Australian Government and within the jurisdiction of the Western Australian state government.

I hope this clarifies all outstanding issues raised in the hearing.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Sutton', written in a cursive style.

Michael Sutton
Acting Executive Director
Infrastructure and Surface Transport Policy

ATTACHMENT A

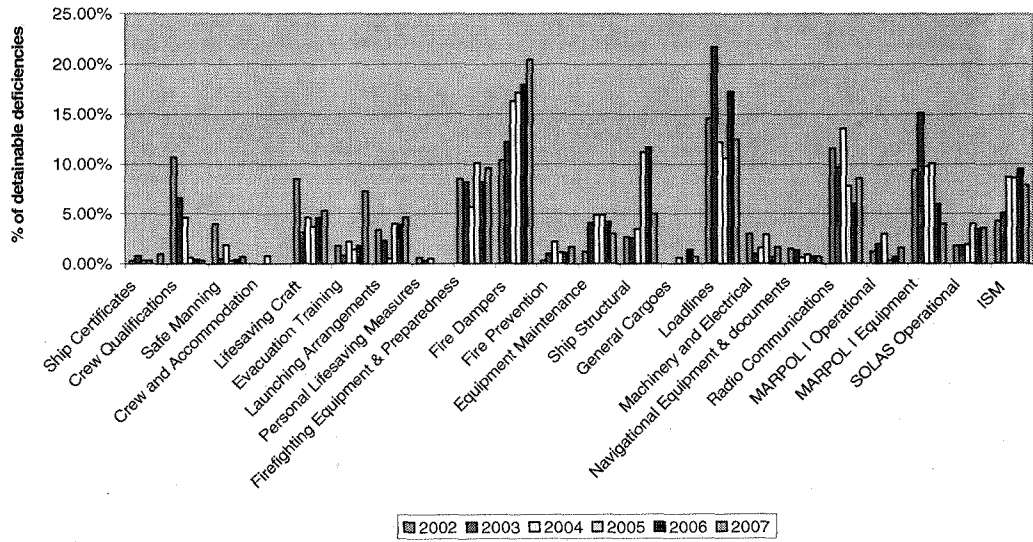
DETAINABLE DEFICIENCIES BY CATEGORY

| Detainable Deficiency by Category | % of Total Detainable Deficiencies | |
|--|------------------------------------|------|
| | 2006 | 2007 |
| 1. Fire Safety Measures (SOLAS Chapter II-2) | 27.5 | 31.9 |
| 2. Life-saving appliances (SOLAS Chapter III) | 10.5 | 17.0 |
| 3. Load Lines | 17.5 | 12.2 |
| 4. Radio communications (SOLAS Chapter IV) | 6.1 | 8.8 |
| 5. ISM related deficiencies (SOLAS Chapter IX) | 9.3 | 7.8 |
| 6. Stability, Structure and Related Equipment (SOLAS Chapter II-1, Parts A-1, A) | 15.7 | 7.8 |
| 7. MARPOL Annex I Oil | 6.4 | 5.4 |
| 8. SOLAS related operational deficiencies | 3.6 | 3.4 |
| 9. Machinery and Electrical installations (SOLAS Chapter II-1, Parts C and D) | 0.7 | 1.7 |
| 10. Certification and watchkeeping for seafarers (STCW) | 0.7 | 1.0 |
| 11. Ship's certificates and documents (SOLAS, Load Lines and MARPOL Conventions) | - | 1.0 |
| 12. Carriage of cargo and dangerous goods (SOLAS Chapter VI) | 1.4 | 0.7 |
| 13. Safety of navigation (SOLAS Chapter V) | 0.7 | 0.7 |
| 14. MARPOL related operational deficiency | - | 0.3 |

DETAINABLE DEFICIENCIES CATEGORIES 2002 TO 2007

| DEFICIENCY GROUP | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 |
|---|-------------|-------------|-------------|-------------|-------------|-------------|
| Ship Certificates | 0.30% | 0.80% | 0.30% | 0.30% | 0.00% | 1.00% |
| Crew Qualifications | 10.70% | 6.60% | 4.60% | 0.60% | 0.40% | 0.30% |
| Safe Manning | 4.00% | 0.50% | 1.90% | 0.30% | 0.40% | 0.70% |
| Crew and Accommodation | 0.00% | 0.00% | 0.80% | 0.00% | 0.00% | 0.00% |
| Lifesaving Craft | 8.50% | 3.10% | 4.60% | 3.70% | 4.60% | 5.30% |
| Evacuation Training | 1.80% | 0.80% | 2.20% | 1.40% | 1.80% | 7.30% |
| Launching Arrangements | 3.40% | 2.30% | 0.50% | 4.00% | 3.90% | 4.60% |
| Personal Lifesaving Measures | 0.60% | 0.30% | 0.50% | 0.00% | 0.00% | 0.00% |
| Firefighting Equipment & Preparedness | 8.50% | 8.20% | 5.70% | 10.10% | 8.20% | 9.60% |
| Fire Dampers | 10.40% | 12.20% | 16.30% | 17.20% | 18.00% | 20.50% |
| Fire Prevention | 0.30% | 1.00% | 2.20% | 1.10% | 1.10% | 1.70% |
| Equipment Maintenance | 1.20% | 4.10% | 4.90% | 4.90% | 4.20% | 3.00% |
| Ship Structural | 2.70% | 2.60% | 3.50% | 11.20% | 11.70% | 5.00% |
| General Cargoes | 0.00% | 0.00% | 0.60% | 0.00% | 1.40% | 0.70% |
| Load lines | 14.60% | 21.70% | 12.20% | 10.60% | 17.30% | 12.50% |
| Machinery and Electrical | 3.00% | 1.00% | 1.60% | 2.90% | 0.70% | 1.70% |
| Navigational Equipment & documentation | 1.50% | 1.30% | 0.60% | 0.90% | 0.70% | 0.70% |
| Radio Communications | 11.60% | 9.70% | 13.60% | 7.80% | 6.00% | 8.60% |
| MARPOL Convention Annex I Oil - Operational | 1.20% | 2.00% | 3.00% | 0.30% | 0.70% | 1.60% |
| MARPOL Convention Annex I Oil - Equipment | 9.40% | 15.10% | 9.80% | 10.10% | 6.00% | 4.00% |
| SOLAS Convention - Operational | 1.80% | 1.80% | 1.90% | 4.00% | 3.50% | 3.60% |
| International Safety Management (ISM) Code | 4.30% | 5.10% | 8.70% | 8.60% | 9.50% | 7.90% |

Detainable Deficiency Categories 2002 to 2007

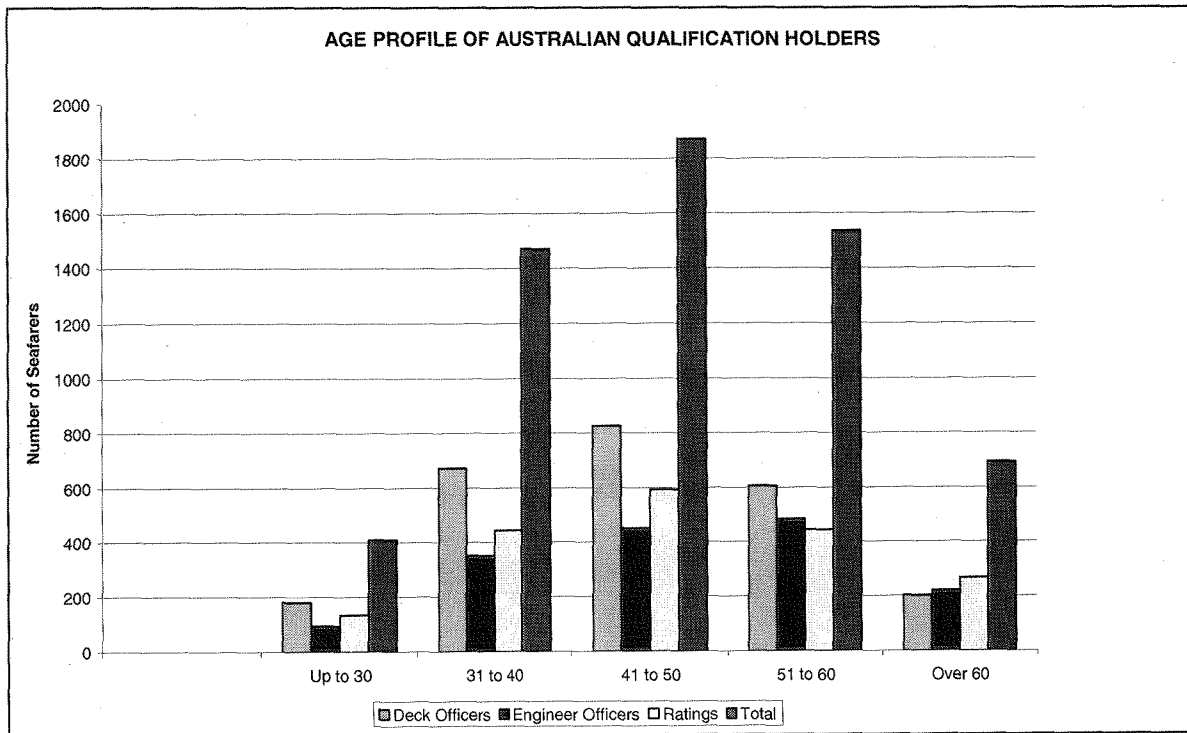


ATTACHEMENT B
 Corrected ATTACHMENT H
 to Departmental Submission

AUSTRALIAN ISSUED SEAFARER QUALIFICATIONS

The table below summarises the age profile in ten year intervals of all deck officers, marine engineer officers and ratings, who hold Australian issued certificates of competency issued by AMSA as at January 2008:

| Age Group (10 year intervals) | Deck Officers | Marine Engineers | Ratings | Total |
|-------------------------------|---------------|------------------|-------------|-------------|
| Up to 30 | 181 | 95 | 134 | 410 |
| 31 to 40 | 673 | 353 | 445 | 1471 |
| 41 to 50 | 827 | 452 | 594 | 1873 |
| 51 to 60 | 607 | 485 | 445 | 1537 |
| Over 60 | 203 | 222 | 268 | 693 |
| Total | 2491 | 1607 | 1886 | 5984 |



**HOUSE OF REPRESENTATIVES STANDING COMMITTEE ON
INFRASTRUCTURE, TRANSPORT, REGIONAL DEVELOPMENT AND
LOCAL GOVERNMENT**

AUSTRALIAN MARITIME SAFETY AUTHORITY

Additional submission on seafarer training to the
Inquiry into Coastal Shipping Policy and Regulation

June 2008

BACKGROUND

AMSA wishes to provide the Committee with additional information on the seafarer training and competency standards applying in Australia in light of evidence about different aspects of the current training regime, including:

- AMSA's role as Australia's flag State authority in applying international standards of seafarer training and certification.
- AMSA's involvement with measures to integrate the State and Northern Territory seafarer training systems with the international training and certification standards, including encouraging Registered Training Organisations' recognition of prior learning and recognition of current competency (RPL/RCC) and making available distance education in relation to gaining seafarer qualifications.
- International training and certification adoption of competency based training, the ability to use ship simulators to demonstrate competencies and the requirement for seafarers to accrue a certain length of sea time before qualifying for higher level certificates of competency.

AMSA's flag State role in applying international training and certification standards

The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW Convention) establishes agreed international standards of training and certification for seafarers generally applying to large trading ships. Australia, as a party to this treaty, is obliged to implement its standards into our national law, mainly through the *Navigation Act 1912* and delegated legislation (Marine Orders) made under that Act, primarily Marine Orders Part 3, *Seagoing Qualifications*.

Under the STCW Convention, AMSA, as Australia's flag State authority, is required to certify that seafarers issued with certificates of competency by Australia meet the Convention's requirements for service at sea on large trading ships. These requirements include having attained the prescribed minimum age, the specified level of medical fitness, the required training and certification and accrual of requisite sea time.

Applicants for an Australian issued certificate of competency also are required to have passed an oral examination conducted by a qualified AMSA marine surveyor. This tests the applicant's ability to apply their operational knowledge and skills and use good seamanship and judgment in dealing with practical situations that a seafarer with the relevant certificate of competency is expected to handle on a routine basis.

AMSA approves Recognised Training Organisations (RTOs) in Australia that provide training courses to the standard required by the STCW Convention and these are regularly audited by AMSA to ensure their course content is consistent with international standards and national law.

AMSA also has a national program of auditing of all RTOs offering short courses compliant with the STCW Convention, which make up the competencies to be attained for the issue of a Certificate of Safety Training. This is the basic qualification enabling people to enter a seagoing career and covers basic fire fighting, elementary first aid, personal survival

techniques, and personal safety and social responsibility. This training is intended to ensure that seafarers are aware of the hazards of working on a vessel and can respond appropriately in an emergency.

The aim of these AMSA audits is to ensure the RTOs' short courses meet the content prescribed in the applicable IMO model training courses, which specify the minimum requirements for training to be compliant with the STCW Convention standards.

IMO Audit of Member States' training and certification systems

The IMO requires its Member States to lodge detailed advice about their national training and certification system to show compliance with the STCW Convention's requirements. Australia's system has been audited by the IMO as part of the STCW Convention's control measures to promote a consistent, global application of training and certification standards and reduce the risk of fraudulent seafarers' certificates.

The IMO has issued a *White List* of maritime administrations that "give full and complete effect" to the STCW Convention as confirmed by the IMO audit of their systems of seafarer training and certification. Australia has maintained its inclusion on the IMO *White List* since it was first published by the IMO in December 2000. Each maritime administration is required to provide the IMO with five yearly updates of information about its national training and certification system, with the second round of submissions by Australia to be made to the IMO shortly.

Australian recognition of overseas certificates of competency

In relation to overseas issued certificates of competency, the STCW Convention provides that no flag State may issue a certificate of competency in recognition of another flag State's certificate, but can only issue a certificate of recognition. The IMO requires a written undertaking concluded between the relevant flag State parties to the Convention that allows recognition of the other's certificates of competency. Each administration must be satisfied that the other administration's training and certification system meets the STCW Convention requirements before entering into such an agreement.

AMSA, on behalf of Australia, has concluded agreements for bilateral recognition of certificates with: Belgium, Denmark, Fiji, Finland, France, Germany, Hong Kong, Iran, Ireland, Italy, Malaysia, the Netherlands, New Zealand, Norway, the Philippines, Romania, Singapore, South Africa and the United Kingdom. AMSA has agreements to recognise certificates issued by: Canada, Denmark, Greece, India, Papua New Guinea and the United States of America.

Other flag States have an agreement with AMSA to recognise Australian issued certificates, including: Antigua and Barbuda, Bahamas, Bangladesh, Barbados, Belize, Brunei, Bulgaria, Cyprus, Dominica, Georgia, Ghana, Indonesia, Isle of Man, Liberia, Malta, Marshall Islands, Mauritius, Panama, St. Vincent and the Grenadines, and Vanuatu.

AMSA's involvement with integrating State and Northern Territory training systems with the international training and certification standards

The State and Northern Territory training systems provide seafarer qualifications for smaller tonnage vessels (eg fishing boats and smaller trading vessels) that generally meet the standards

in the Uniform Shipping Laws (USL) Code or the National Standard for Commercial Vessels (NSCV), Part D, *Crew Competencies*.

The requirements for issue of a State or Territory qualification do not generally meet the full range of competencies required to comply with the STCW Convention standards. In addition, State or Territory qualifications may include conditions or limitations on their use that restrict the holder to service on certain vessels that only operate in a specific area. One of these limitations is to restrict the holder to serve on vessels only engaged on near-coastal voyages. In this case, the qualification holder is not considered to have the training and/or experience to be engaged on deep-sea voyaging, large commercial ships.

If the holders of State or Territory qualifications want to serve on larger commercial vessels, they need to obtain an endorsement from AMSA under the STCW Convention for their State or Territory certificate of competency to confirm that their training and experience meet the STCW Convention standards. This often involves the State or Territory qualification holder having to undertake additional training to cover the broader range of competencies and higher standards required under the STCW Convention compared to the State or Territory qualification requirements.

After completing this additional training, the holder of a State or Territory qualification may receive from AMSA an STCW Convention endorsement certifying that the holder has attained the relevant equivalent grade of certificate under the STCW Convention. If the State or Territory qualification is subject to conditions or limitations on its use, its endorsement by AMSA under the STCW Convention must be subject to the same conditions or limitations. For instance, a State or Territory qualification restricting the holder to service on vessels on near-coastal voyages will only receive an STCW Convention endorsement restricted to vessels on near-coastal voyages.

In response to difficulties experienced by some State and Territory qualification holders in gaining overseas recognition of their AMSA endorsed certificates of competency, AMSA introduced in 2004 a new structure in regard to deck certificates. Two new AMSA deck certificates of competency were created to replace the issuing of AMSA STCW endorsements on State and Territory issued master class three and master class four (other than near-coastal) certificates. The new certificates fully conform to the STCW Convention standards and aim at resolving the recognition problems encountered with State and Territory certificates. The conversion of a State or Territory qualification to one of the new certificates requires applicants to have undertaken training and service requirements for issue of the new certificate, as specified by Marine Orders Part 3.

Maritime Industry Training Package

Industry training packages are sets of nationally endorsed standards and qualifications for recognising and assessing an individual's competency by describing the skills and knowledge needed to perform effectively in a particular workplace. However, they do not prescribe how an individual should be trained.

The Transport and Logistics Industry Skills Council (formerly Transport and Distribution Training Australia) has developed high quality training packages for the transport sectors, in consultation with the relevant industries and provides professional development programs for users of the training packages in each State and Territory.

AMSA is a member of the Council's Maritime Sector Committee, which provides the Council with advice on the integration of training standards and related issues across the maritime industry. AMSA has been involved in the development of the Council's Maritime Training Package, which has been approved by the Australian Department of Education, Employment and Workplace Relations and by the relevant State and Territory authorities. AMSA is currently participating in the Council's review of the Maritime Training Package, which the Council plans to have completed by the end of 2008.

The Package covers all aspects of maritime industry training and represents a seamless progression from basic qualifications through to STCW Convention standard qualifications. It provides the basis for RTOs to deliver training, assess competencies and issue qualifications to meet a consistent standard across the maritime industry.

While the Maritime Training Package provides the competencies to be gained, it does not specify course content to achieve those competencies. Hence, AMSA is using the IMO's Model Training Courses to achieve uniformity in the standards of training and education to meet the standards of the STCW Convention and provide consistency across State and Territory jurisdictions.

The Australian Quality Training Framework (AQTF) was revised from 1 July 2007 to improve the quality of training and assessment in the vocational education and training sector. The Australian Quality Training Framework 2007 (AQTF 2007) is the national set of standards, which assures nationally consistent, high-quality training and assessment services for Australia's vocational education and training system. Training providers must meet the AQTF 2007 standards to become registered by State registration and course accreditation authorities, which ensures the quality of vocational education and training services throughout Australia.

In compliance with the AQTF 2007 requirements, AMSA is seeking to conclude memorandums of understanding with relevant State registration and course accreditation authorities, such as the New South Wales Vocational Education and Training Accreditation Board and the Western Australian Training Accreditation Council, to minimise duplication of audits of RTOs recognized by AMSA as delivering STCW Convention compliant courses and by State or Territory registration and accreditation authorities.

RTOs recognition of prior learning and providing distance education

AMSA supports open education, by allowing distance education, modularization of courses and adoption by RTOs of procedures for recognition of prior learning and recognition of current competency (RPL/RCC). The adoption by AMSA of the Maritime Training Package has provided the means for RTOs to implement these options within the AQTF system.

There already is an element of distance learning involved with the AMSA approved *Task and Guided Study and Training Record Books*, which allow deck cadets/deck watch keepers and engineer cadets/engine room watch keepers to continue their training at sea in shipboard familiarisation and watch keeper pre-study. This meets the requirement in the STCW Code for cadets to have an approved program of on-board training during their seagoing service. They are required to receive systematic practical training and experience in the tasks, duties and responsibilities of an officer in charge of a navigational watch or an engine room watch under

the close supervision and monitoring of qualified officers and to have this training adequately documented in a record book.

AMSA convened a forum for AMSA approved RTOs in July 2006 in Canberra. AMSA advised the providers of the future alignment of appropriate qualifications issued under the AQTF Maritime Training Package as satisfying the pre-requisite training for issue of STCW Convention certificates of competency. The forum discussed AMSA's policy on training issues and future directions in industry training requirements and competency standards, allowing an open exchange of ideas between AMSA officers and training providers. AMSA advised the RTOs that AMSA supported implementation of distance education and recognition of prior learning principles.

AMSA also has created an RTO access area on its Internet site explaining new maritime training initiatives and AMSA's policy on matters relevant to RTOs.

Seafarer career path progression

AMSA is taking an active role in enhancing the ability of seafarers to progress from entry-level State/Territory issued qualifications for small ship operations to the highest certificates provided under the STCW Convention for large ship operations. AMSA is attempting to develop a seamless career path from the smallest commercial boats to the largest ocean going ships through its "Tinny to Tanker" concept. This aligns with the new national Maritime Training Package, while also requiring a review of Marine Orders Part 3 and the introduction of NSCV Part D aligned certificates by State and Territory maritime administrations.

A vital element in creating a seamless career path is the harmonisation between the international training and certification requirements of the STCW Convention and the State/Territory qualifications systems.

In 2001, the National Marine Safety Committee developed Part D, *Crew Competencies*, of the National Standard for Commercial Vessels. The future adoption by the States/Northern Territory of the National Standard for Commercial Vessels is aimed at facilitating consistency of competency standards across jurisdictions. In 2007, the National Marine Safety Committee commenced a review of the standards in Part D of the National Standard for Commercial Vessels, including operational standards for ships' crew and medical and sea time requirements.

AMSA foresees this review as the opportunity for further integration between the requirements in Part D and the STCW Convention standards administered by AMSA. This would allow the development of competency standards for vessels operating in Australian near coastal waters within the flexibilities allowed by the STCW Convention, instead of these remaining outside of the STCW Convention qualifications system.

In AMSA's view, the revised Part D could allow for restricted qualifications, applying to inland waters and local operation of vessels within a particular State or Territory, and unrestricted qualifications. The latter would be recognised by other jurisdictions and allow for transition to AMSA issued unlimited qualifications under the STCW Convention through the Maritime Training Package of the Transport and Logistics Industry Skills Council, the transport industry training advisory body.

AMSA also advocates the adoption of the medical standards and medical fitness assessment guidelines applying under the AMSA administered Marine Orders Part 9, *Health - Medical Fitness*, in the National Standard for Commercial Vessels. This is aimed at further integration of the qualifications systems administered by AMSA and the State/Territory marine administrations.

AMSA also has undertaken initiatives to ensure sea time is given appropriate recognition accrued on vessels of the Australian Customs Service and Royal Australian Navy (RAN). AMSA has worked with the RAN to facilitate the career path of former Navy seagoing officers into the commercial shipping industry by gaining AMSA issued certificates of competency compliant with international training and competency standards governing crews on larger commercial ships.

While a considerable degree of correlation existed between these international requirements and the training and seagoing service in the Navy, the nature of work in the Navy meant there were some gaps between the two systems, primarily in the coverage of cargo work and ship stability. AMSA worked on a means to ensure appropriate recognition was given to Navy training and sea service in AMSA's assessment of the degree of compliance with the international standards and developed with the Navy a bridging course to cover the gaps in relation to cargo work and ship stability. From 1 July 2006, the bridging course became part of the RTO training program.

AMSA is currently completing work with the RAN to ensure the training provided meets the requirements of the STCW Convention. This will result in the ability for a RAN Officer to qualify for an STCW Certificate whilst still serving in the Navy. From the 1 January 2009 it is anticipated that the bridging course will become part of the Navy training program.

AMSA worked with the Australian Customs Service on a similar project to enable the recognition of sea service on relevant Customs' vessels towards meeting the requirements for issue of qualifications by AMSA compliant with international standards.

Competency based approach in the international training and certification standards and the sea time requirements

The STCW Convention was originally made by the International Maritime Organization (IMO) in 1978. A substantial revision of the Convention in 1995 resulted in the adoption of a more competency based approach. The revised technical regulations specified minimum standards of competence for the range of certificates issued under the Convention in terms of a particular competency, the area of knowledge, understanding and proficiency within each competency, the methods of demonstrating competence and the criteria for evaluating competence.

The changes introduced by the 1995 revision of the Convention and the adoption of the STCW Code covering technical requirements came into operation in 1997 and were phased-in over a five year period and became completely operative in 2002.

In 2005, the IMO initiated another comprehensive review of the STCW Convention and the STCW Code to take account of the social and technological developments over the decade since the previous review. This second review is expected to result in the IMO making a revised STCW Convention in 2010 and it is anticipated that there will be a period of some years for the changes to become fully operational.

A number of principles have been adopted by the IMO to guide the second review, including agreement to retain the structure and goals of the 1995 revision of the Convention and not to reduce its existing standards or amend its articles. There also is recognition of the need to provide greater flexibility in the levels of training and certification to take account of technological innovations and promote modern management concepts within the Convention, including the increased importance of communication and leadership skills and greater emphasis on teamwork in bridge and engine room resource management systems.

Australia is an active participant in the IMO review process with its delegation including representatives of AMSA, the Australian Shipowners Association and the Australian Institute of Marine and Power Engineers. AMSA also is consulting widely with major stakeholders in the shipping industry to gain input to the review.

Standards for use of simulators in training and competency assessment

The STCW Convention provides for the use of simulators and the STCW Code specifies the performance standards for the use of simulators in training and as one of the recognized means for seafarers to demonstrate competence. The Code includes requirements and guidance on the development of procedures by marine administrations for simulator-based training and assessment of a candidate's ability to demonstrate levels of competency.

Qualifying Seagoing Service

The STCW Convention provides mandatory minimum requirements for the certification of seafarers, which include prescribed minimum lengths of approved seagoing service, which is service on a ship relevant to the issue of a certificate or other qualification. This may include a specified time during this service performing particular duties (eg watchkeeping) under the supervision of qualified officers.

