

Meg Crooks
Committee Secretary
House of Representatives Standing Committee
On Communications, Transport and Arts
Parliament House
Canberra ACT 2600

9th August 1999

Dear Ms Crooks

Re: Fatigue in Transport.

AIMPE writes to make a brief submission to the Inquiry to the above matter.

Firstly please accept my apology for the lateness of the submission.

Enclosed please find a photocopy of a recent publication by the International Transport Workers' Federation (ITF) entitled "Seafarer Fatigue: Wake up to the dangers". This was produced after the Australian Maritime Safety Authority's study into Fatigue and Occupational Health and Safety in the Australian Maritime industry.

I understand that AMSA provided you with their report however I was unsure whether you had received the ITF report.

Regarding the AMSA report the main observation AIMPE would make is that it was limited in scope by AMSA jurisdiction. Therefore it did not cover vessels under State or Territory jurisdiction.

Tugboats for example during normal harbour operations came under State/Territory jurisdiction.

The latest ILO convention on Standards Training Certification and Watchkeeping (STCW '95) likewise does not cover port or river vessels.

AIMPE sees the STCW '95 provisions regarding fitness for duty (14 hours maximum on duty 10 hours minimum off duty) as providing a useful basis for domestic regulation.

In the Australian context, AIMPE feels that it is important that such provisions be enforceable at both State/Territory and Federal level.

AIMPE is also of the view that these provisions would be better to be embodied in legislation than to be negotiated in enterprise agreements.

Yours faithfully,

MARTIN BYRNE
ASSISTANT FEDERAL SECRETARY

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