Australian Government
Australian Maritime Safety Authority

Consultation Report
National Standard for Commercial Vessels, Part G – General Safety Requirements

(being re-titled as National Standard for Commercial Vessels, Part G – Non-survey vessels)

The revision of the *National Standard for Commercial Vessels, Part G – General Safety Requirements* (NSCV Part G) has been informed by public feedback and input provided by a reference group made up of members from state & territory marine safety agencies, industry representatives and technical experts; and broader consultation with the public. The consultation that has been undertaken to develop the revised NSCV Part G includes:

(a) A discussion paper in July 2013 to define the scope of the revisions to the Part.

(b) An initial reference group meeting in September 2013 in Sydney for *National Standard for Commercial Vessels, Part F2 – Leisure craft* (NSCV Part F2) that identified and refined the requirements in NSCV Part G and NSCV Part F2 that were causing confusion for industry or were unnecessarily burdensome, thereby requiring review.

(c) A subsequent reference group meeting in April 2014 in Adelaide to review the technical content for NSCV Part F2 and Part G before making a draft available for public consultation.

(d) Public consultation via the AMSA website on the draft standard (*NSCV Part F2 – Leisure craft and non-survey vessels* - that subsumed the technical content from NSCV Part G) between 2 January 2015 and 13 February 2015 – 443 comments were received. AMSA has previously published a summary of these comments so are not restated in this Consultation Report (see (f)).

(e) A reference group meeting in March 2015 to review the public submissions and consider technical matters.

(f) The 'NSCV Part F2 consultation report' was made available on the AMSA website from May 2015 to October 2015 detailing the outcomes of the review of the submissions.

(g) Further feedback was sought from industry via the AMSA website in July 2015 - 287 comments were received and considered during consultation on the following drafts:

- *Marine Order 503 (Certificates of survey – national law) Amendment 2015 (MO503)*
- *Domestic Commercial Vessel Manual – Leisure craft*

- *Domestic Commercial Vessel Manual – Non Survey Vessels*

(h) A substantially revised draft of *NSCV Part G – Non-survey vessels* was made available for public consultation via the AMSA website in July 2016. 45 submissions were received and considered by AMSA. These submissions and AMSA's response to these submissions are set out in **Table 1**.

(i) Consultation with members of the Domestic Commercial Vessel Industry Advisory Committee (DCVIAC) and the Fishing Industry Advisory Committees (FIAC) was undertaken in the period between September 2016 and December 2016. 5 submissions were received and considered by AMSA. A summary of these submissions are included in **Table 2.**

TABLE 1

Comment No.	Provision / Clause	Industry comment / submission	Response to submission
1.	General	Good effort getting this out.	Noted.
2.	Table 1	An enclosed kayak can't meet the test 'permit quick exit of persons' included in the table. Suggest you unpack- perhaps caveat by saying ' in the case of a kayak with skirt ensure quick egress by persons trained to do so' or similar	Noted. This clause/table has been amended to include reference to a specific standard the ABYC H-29 standard as an option as well.
3.	3(b)	Suggests that a vessel with a shaft must meet all of the requirements of C5A- this can't be right as further sections deal with fuel etc; suggest this points to the shafting requirements specifically.	The standard has been updated to reflect Chapter 3 of NSCV Part C5A.
4.	2.5	Only allows level flotation- this is a fundamental issue- you have EX40 for vessels that are in a higher risk category than these ones- EX 40 allows pragmatic options- suggest at the least you replicate those sensible options or explain why you are imposing a higher regulatory burden on these lower risk vessels. Unless I have missed a nuance here- in which case I'd suggest it is given more prominence!!	Thank you for your comments. The clause intends to provide options for achieving the desired flotation outcomes that reflect the kinds of options provided in EX40. This section has been updated to make the intention clearer by way of a table that provides 3 options.
5.	2.5 3(c)	Is unclear- it seems to put a requirement on all vessel operations to wear life jackets. Suggest its reworded- clause b above it is much clearer	Noted. As per above comment, this has l been further clarified as to the intent in the redrafted table of options.
6.	2.4 (3) (c) (ii)	Replace "J1527 Marine Fuel Hoses" with "SAE J1527 Marine Fuel Hoses"	This has been corrected. Thank you.

Comment No.	Provision / Clause	Industry comment / submission	Response to submission
7.	2.5 Standards for flotation	Remove 15 degree limiting water temp for the options. Instead, make this an operational consideration. There are other risks that could be addressed here but are not, such as crocodiles or stingers in the north. The cold water should be treated in a similar vein ie. operational rather than prescriptive. There is also the issue of inland waterways such as the Murray which fall below 15 degrees for a few months of the year in certain areas. The proximity to the shore in the case of capsize is a mitigating factor that is not accounted for by a blanket 15 degree restriction.	Thank you for this submission. This matter was also specifically considered in the draft NSCV Part F2 that was subsequently open for public consultation. Whilst there were differing views received during the consultation period, the final outcome is that the option for float off buoyancy will be available, subject to operational consideration and a documented risk analysis for the specific vessel and its operations. General guidance will also be included in the standard as to the kinds of matters that would likely negate the use of the option such as colder water, waters infested hazardous flora or fauna (for example crocodiles or Irukandji etc).
8.	3.6 Tables 5, 6, 7	The term "Buoyant Appliance" is ambiguous and not in accordance with the NSCV or USL Code in this application. Recommend changing to "Lifebuoy". In addition, the USL Code and NSCV only require a hauling line attached to a second lifebuoy when required above a certain vessel length. ie. Vessels =12m need 2 lifebuoys, one w light, the other w line. Recommend amending to be consistent with other DCV's and avoid confusion at the time of survey.	Noted.
9.	3.6 Tables 2, 5, 6, 7	Can we include a note in the safety equipment sections re Nav Lights and limited visibility? Some states would always insist on Nav Lights being installed because you never know when you will be in a fog or heavy rain. In many cases the design of the vessel isn't suitable for nav light installations. Could the note be something like: On vessels where the installation of navigation light is not practicable, the vessel shall not be operated outside of daylight hours or at times of limited visibility.	Noted. We have attempted to capture the intent of this submission in the standard.
10.	table 1 (4)	Many electric motors are available in 24 volts recommend future proof standard by increasing from 12 to 24 volts	Noted. We have revised the standard to refer to ≤24 volts as per your submission.
11.	table 1 (6)	Verification of standards for compliance on personal watercrafts (PWC's) difficult, see attachment of a Bombardier compliance plate for many popular models sold in Australia. This appears to be the "norm" for PWC's	Thank you for your submission. It is AMSA's view that the vessel needs to comply with one of the standards listed. If the vessel is being imported and complies with either (ISO) and is CE marked or US standards then it will need to have appropriate documentation

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		sold here and accepted by the US Coast Guard. There is no reference to standards compliance that is readily available to show compliance.	issued by an appropriate issuing body to substantiate it meets the standard.
12.	Part 2.4	Fuel Systems for US built vessels do not comply to ISO standards, instead they use ABYC standards or CFR requirements. Recommend the standard should cater for vessels built to ABYC standards/ CFR (US boats)	Noted. Vessels that comply with ABYC standards are able to utilise the harmonisation table provided by the ABYC to demonstrate conformity with the relevant ISO standard.
13.	Part 2.5	We would recommend consideration is given to permit the use of NSCV Part 6B and the direct calculation method for level flotation as an option for all vessels including tenders as it does not require the mandatory swamp testing which RMS has found problematic and not fully embraced by industry, furthermore consideration of the adoption of basic flotation criteria again for vessels in D and E waters above 15 degrees water temperature would be a measured outcome in terms of risk.	Noted. As per above comment, this has been further clarified as to the intent in the redrafted table of options for flotation.
14.	Part 2.2 (3) (b)	There appears to be no upper limit on powering within this standard therefore it may not be a good standard to reference.	Noted. It is understood that NSCV Part C5A doesn't have a maximum powering clause and as such is only available as an option to those vessels with a shaft.
15.	Table 2	General - we have found the clarification of "remote" difficult to qualify in discussions with customers for the carriage of flares.	Noted. A definition will be included to provide clarity that this applies to isolated waterways with limited access to shore based facilities and rescue services.
16.	Tables 2,3,5,6,7	Reference to remote enclosed waters needs clarification to ensure consistency across surveyors. There has already been a number of enquiries on this issue.	Noted. A definition has been included to provide clarity that this applies to isolated waterways with limited access to shore based facilities and rescue services.
17.	2.5 (b) (i)	Mandatory requirement to wear a lifejacket and the implications of this should be thought out as invariably it lead to anomalies against states legislation for lifejacket wear. An example would be that a small marina tender running passengers to vessels or small workboats and fishing vessels needing to comply with lifejacket wear, consideration of the risk (cold waters	AMSA is committed to promoting safety on the water and improving safety culture, and this includes the carriage and wearing of lifejackets. It is understood that there may have a differing standard for Class 4 vessels compared to those required by recreational boating legislation in each of the states/territory. However, the intention is to provide a common commercial standard in order for these vessels to operate nationally. The options available for flotation have been revised and captured in a table. The mandatory

Comment No.	Provision / Clause	Industry comment / submission	Response to submission
			wearing of a lifejacket to meet the flotation requirements has been considered based on feedback received on both NSCV Part G & F2. Generally, the standard will align wearing of a lifejacket with the state/territory requirements for recreational craft.
18.	table 2 (b)	Non-keel sailing boats that are less than 7.5m generally are not equipped with safety equipment i.e. lasers etc. have no anchor, bilge pump, lifebuoy ring and tend to supply the operator with a lifejacket only.	Noted. This has been further clarified in the equipment tables.
19.	Table 6 and Table 7	Fire Extinguishers - the requirement for two extinguishers as the option at 4.5kg each in may cases is excessive and has been an ongoing criticism from operators, recommend this clause is harmonised or refined to those under subparagraph (b)	Noted. Whilst the 2 x 4.5kg is prescriptive and may not suit all vessels, the option of using the AS standards has been provided and is performance based to provide flexibility.
20.	Table 8	The bilge requirements are not a graded approach and a bit disjointed. e.g. above 7.5m the requirements increase close to 200% at this break point. Also the pumps are massive and excessive to what the realistic requirements to pump on vessels swamped, holed etc. A vessel < 7.5m could probably only stay positively buoyant with less than 1 to 1.5 tonne of water. Would recommend the bilging capacities are graded on actual pumping requirements and a more linear increase in capacity versus length.	Noted. The table intends to align to the requirements in NSCV Part C that apply to other domestic commercial vessels. The table has been updated to reflect the lower ranges indicated in NSCV Part C.
21.	2.5 Standards for flotation	After (2)(a) ABYC Standards add AS1799.1-2009 Small Craft, Part 1: General requirements for power boats It is assumed leaving out AS1799.1 was an error	Noted. AS1799.1 has been included as an additional option.
22.	2.5 Standards for flotation	After (3)(a)(i) ABYC Standards and add AS1799.1-2009 Small Craft, Part 1: General requirements for power boat It is assumed leaving out AS1799.1 was an error	Noted. AS1799.1 has been included as an additional option.
23.	Table 2(b)	Is the requirement for a buoyant device necessary on a 7.5m sailing vessel, say a Hobie Cat? Perhaps a requirement that all persons wear a life jacket while on board if no buoyant device carried.	This requirement has been further clarified in the standard to be more appropriate for keel sailing vessels.

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24.	Table 4 in safety equipment for	In Quantity column for both red handheld distress flares AND orange smoke hand held add:- 2 if operating in remote enclosed sheltered waters or >2nm from land	Thank you for your submission. This has been updated in the standard.
25.	General	We has no further comment to make on this document.	Thank you for your review.
26.	General	Comment provided in attachment (Captured as comments 2694 to 2709)	Noted. Thank you for your review. Responses have been provided below against each comment.
27.	Table 1 – 4(a) and 4(b)	Refer to ABYC standard H29 canoes and kayaks as an alternative deemed to satisfy solution. Table 1 row 4 now implies that buoyancy is not required in canoes or kayaks. The standards referred to in 2.5 do not cover buoyancy in canoes or kayaks. A canoe fitted with either an electric or petrol outboard is unlikely to be able to meet level flotation standards because they lack sufficient breadth. A specific buoyancy solution is required. ie, ABYC H29. To permit electric propulsion and not allow small petrol outboard with self contained fuel source is not an equitable treatment.	Noted. H-29 has been added as an additional option for meeting the standard. The draft reflected the current requirements for canoes and kayaks in NSCV Part G.
28.	2.4 Fuel Systems 3(c)	A one size fits all approach is not appropriate for fuel hoses. Whilst flexible hoses in permanently installed parts of the fuel system need to meet a standard with a fire rating component. It is reasonable to permit the use of OEM flexible hose (which is typically only an SAE 30R7 standard) between an outboard and portable fuel tank or between the outboard and an externally mounted fuel filter (ie, not more than 1.5 meters of hose)	Noted. This has been amended and clarified.
29.	2.5 Standards for flotation 2(a) b, c and d	Define more precisely which specific parts of ISO 12217 provide for LEVEL flotation to be used.	Noted. The specific parts of the standard has been identified and tabularised to provide clarity.

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30.	2.5 Standards for flotation 3(a) ii, iii and iv	Define more precisely which specific parts of ISO 12217 provide for LEVEL flotation to be used.	Noted. The specific parts of the standard have been identified and tabularised to provide clarity.
31.	2.5 Standards for flotation 3(a) vi, vii and viii	ISO 6185 does not utilise LEVEL flotation	Noted. This has been amended and clarified. The intention is that where RIBS/collared vessels/inflatables utilise ISO 6185 they meet the flotation requirements of the standard and are deemed to have met level flotation.
32.	2.5 Standards for flotation 3(b)(ii) f, g and h	ISO 6185 does not utilise BASIC flotation It is more appropriate to state that compliance with ISO 6185 is deemed equivalent to LEVEL flotation.	Noted. This has been further clarified as to the intent.
33.	2.5 Standards for flotation 3(b)(ii)(a)	It is worthy to note that ABYC only provides for BASIC flotation to be used on inboard powered vessels. The method within ABYC for determining BASIC flotation does not contemplate how the mass of an outboard should be accounted for, it is a corruption of the standard to use it in such a way.	Clause 8.5.1 of ABYC H-8 indicates minimum requirements for different types of vessels. The criteria for level flotation can still be applied to inboard powered vessels as a more onerous requirement.
34.	2.5 Standards for flotation 3(b)(ii) c, d and e	Define more precisely which specific parts of ISO 12217 provide for BASIC flotation to be used.	Noted. This has been further clarified as to the intent.
35.	2.5 Standards for flotation 3(c) (i), (ii) and (iii)	“dingy” has not been defined or any requirements specified. A dingy used in this manner must at the very least have LEVEL flotation and probably also hand holds, reflective tape, pair of oars, bailer.	Noted. The flotation table has been further clarified as to the intent. Where a dinghy is used in place of a life raft, the requirements are mentioned in Schedule 1.
36.	3.5 Safety equipment belonging to parent vessel (1)	(e) dingy	Noted and incorporated.
37.	Table 2	The term “remote enclosed sheltered waters” is unable to be determined. “sheltered waters” is defined by NSCV as all D and E waters. “enclosed” in Victoria are specific and declared by state	Noted. This has been further clarified as to the intent.

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		legislation and don't necessarily align with sheltered waters. "remote" has not been defined. Putting all three terms together makes it completely ambiguous as to what circumstance the requirement applies.	
38.	Schedule 1 Row 4 and Row 6	Whilst an EPIRB does not meet the communication equipment requirement. It should be permitted and promoted as an alternative to flares. The Victorian Coroner has commented on the need for EPIRBS or PLB's in all waters. A flare is only effective if there is someone around to see it and they are able to do something about it. Local laws in many Victorian Inland waters prohibit the use of flare due to the risk of bushfire. Alternative solutions are required.	Noted. The option to carry an EPIRB in lieu of distress signals has been incorporated where distress signals are prohibited in the area of operation.
39.	2.5 Standards for floatation	Is there an reason to exclude AS1799 from the applicable standards for level flotation	Noted. AS1799.1-2009 has been included as an additional option.
40.	Table 2	The types of safety equipment are not practical for human powered vessels and off the beach sailing yachts. Anchors, lifebuoys are not relevant for these vessels.	Noted. The tables have been updated to reflect that anchors, lifebuoys etc relate to keel sailing vessels.
41.	Table 2	Type of lifejacket should be specially considered for off the beach sailboats and human powered vessels. A type 100 is not practical for action sports.	Noted. The standard has been amended to provide for more practical types of lifejackets for off the beach kinds of vessels.
42.	Table 7	This table appears to contain a subjective requirement in relation to the carriage of anchors. Anchors should not be optional in inshore waters.	Noted. This has been adopted.
43.	Ch 2.3 Clause (4)	The statement refers to the standard being used to be consistent with the stand within Clause 2.5 for Flotation. This was the same in the previous Part G. This is a reasonable requirement, however, one of the options in Clause 2.5 is to use NSCV Part C Section 6B to determine the level flotation requirements. Clause 2.3 has no NSCV	Thank you for your submissions. The standard has been amended to include the requirement to use AS1799 to comply with 2.3 if NSCV Part 6B is used to comply with 2.5.

Comment No.	Provision / Clause	Industry comment / submission	Response to submission
		option, since it does not have requirements relating to Maximum Load Capacity. Some sort of clause is required to noted under what situations NSCV Part C Section 6B can be used. i.e., is it always acceptable, or only, say, in conjunction with AS1799 for load capacity?	

AMSA received a number of submissions following the close of the formal consultation period. Those submissions were considered by AMSA in developing the revised NSCV Part G, and are summarised as follows:

Comment No.	Provision / Clause	Industry comment / submission	Response to submission
44.	Safety Equipment on Tenders	Concern was raised that prior to the National Law, owners and operators in Queensland were previously not required to carry lifejackets on tenders where the vessel has positive (level) flotation and operated only a short distance from the parent vessel.	Noted – this matter was further considered industry advisory groups after the public consultation. The final outcome to this matter is detailed below.
45.	Licencing of operators on Class 4 vessels (contained within Chapter 13 of the draft NSCV Part F2)	Concerns were raised about fully aligning the recreational licencing requirements with each state / territory, as vessels that operate under 10 knots were previously permitted to operate without a licence.	The intention of the standard is to align with the current licencing requirements for hirers of Class 4 vessels. NSCV Part F2 has been updated to reflect the intent to: ○ continue to allow vessels operating under 10 knots in D & E waters to do so without a licence where the owner/operator considers them to be competent to operate the vessel in the designated cruising area (this also accommodates human powered vessels, houseboats etc); and ○ require a recreational licence (where the state / territory requires licence) for those vessels that operate over 10 knots or outside D & E waters. ○ For PWC in a pen / tour – no licence is required. ○ For takeaway PWC, a recreational licence is required if the state requires one.

The submission on carriage of lifejackets on tenders (comment no 44 in the above table) was further considered by the Domestic Commercial Vessel Industry Advisory Committee (DCVIAC) and the Fishing Industry Advisory Committees (FIAC) in late 2016. The Committees comprise a total of 32 industry members (17 on DCVIAC and 15 on FIAC) that represent vessels in all operational classes (Classes 1, 2, 3 and 4). A paper was prepared for both groups that provided three (3) alternative tender equipment tables for consideration, in addition to the equipment table originally proposed by AMSA. Those alternatives included possible changes to:

- the carriage of distress signals (only requiring them in remote enclosed waters and > than 2nm from land, or where the parent vessel is required to carry flares, or where the tender is able to communicate with the parent vessel) – *see comment no. 24 that also proposed this alternative.*
- clarify that only mechanically propelled tenders require a secondary means of propulsion; and
- consideration that lifejackets complements for tenders could be taken form the parent vessel complement.

Additionally, both Committees were also provided an additional proposal from a Class 4 industry association that proposed that tenders with level flotation should not be required to carry lifejackets when they operated only a short distance from the parent vessel. Key concerns raised related to limited storage facilities for lifejackets on board the tender. These Committees were asked to consider whether the original proposed table (in the July 2016 public consultation draft) should be retained or whether one of the proposed alternatives were more appropriate. Five (5) submissions were received and are set out in **Table 2.**

TABLE 2

Comment No.	Provision / Clause	Committee member responses	Response to submission
1.	Safety Equipment table for tenders	I support the AMSA original proposal.	Thank you for your review.
2.	Safety Equipment table for tenders	Thank-you for the opportunity to comments on the {industry association} proposal. As mentioned by me at the last DCVIAC it would be my preference that life jackets be carried in all vessels, however after listening to the presentations by the association and looking at the practicality of carrying lifejackets in specific circumstances I believe some flexibility is possible, but not to the extent requested. First and foremost, any vessel travelling out of line of sight from the parent vessel should carry lifejackets – this should not be negotiable, so the term ‘’line of sight’’ is extremely important. Secondly the size of a tender vessel is also critically important in this sort of situation as any exemption could lead to misinterpretation.	Thank you for your review. AMSA is committed to promoting safety on the water and improving safety culture, and this includes the carriage and wearing of lifejackets. As such, after reviewing the submissions and considering other matters including coronials and marine incidents, the standard will continue to require the carriage of lifejackets on all vessels including tenders. The definition for tender requires that it be within line of sight of the parent vessel or another distance approved by the National Regulator (see the definition for tender in NSCV Part B and EX02).

Comment No.	Provision / Clause	Committee member responses	Response to submission
		Thirdly, the operational area and distance from the parent vessel needs to be defined in such a way that a rescue could be carried out from the parent vessel in a timely and efficient manner. Fourth, the depth of water will also play an important part – more so than the temperature? We are talking about moving people from a larger vessel into an area that is shallow (to a safe landing area on the shore) I would therefore be comfortable with the following amendments to their proposal; 1. An exemption be applied to the area defined as SMOOTH WATERS only. The waters bounded by an imaginary line drawn from Dalrymple Point on the mainland to Adelaide Point on the mainland along the shore to Dalrymple Point. 2. Smooth waters are those defined in the chartlet: Bowen, Whitsunday and Repulse Bay Map S8sw-9-4 25 July 2016 (attached) This will also eliminate any fishermen trying to use this exemption. 3. Maximum size of a tender operated under this exemption be 4.8 metres 4. The tender will operate in direct line of sight from the parent vessel to a distance not exceeding 500 metres in a direct line from the parent vessel to the shore. 5. Tenders must have level flotation and be fitted with grab lines. 6. An alternate means of propulsion must still be carried (oars come in many fold up type arrangements that require minimum storage)	The definition of tender also provides that they must be <7.5m or another length approved by the National Regulator. As mentioned above, the definition of tender requires that it be within line of sight of the parent vessel. The operation of the vessel (including safety loading and unloading of persons / cargo) and emergency procedures must be considered as part of the safety management procedure. Noted. Operational areas D and E are defined by each of the states and Territory. Exemption 02 defines tenders as those <7.5m. The definition for tender requires that it be within line of sight of the parent vessel or another distance approved by the National Regulator (see the definition for tender in NSCV Part B and EX02).NSCV Part G requires that tenders have level flotation.

Comment No.	Provision / Clause	Committee member responses	Response to submission
		7. A basic recreational equivalent grab bag be carried. As per recreational requirements – all children under 12 must still wear lifejackets. I have attached a short movie clip supplied by the operators and a risk assessment prepared by them as well for use when making and considerations.	A secondary means of propulsion is required for tenders with mechanical means of propulsion. The wearing of lifejackets for Class 4 tenders will refer to the requirements of the state and Territory legislation where the vessel is operating. The standard requires that the operator assess their operation and determine if additional equipment is required to be carried over the minimum requirements in the equipment tables. Thank you for sending through the clip.
3.	Safety Equipment table for tenders	A couple of points for consideration when making a decision that I believe are quite relevant having worked around the Hire Drive Industry in the Whitsundays for a period of close to 16 years, and having recreationally used these hire and drive vessels myself: 1. Consideration needs to be given to the lack of experience that the general public has when operating a hire and drive vessel. They are given a significant briefing and then let loose on the water to their own devices in an environment that is generally unfamiliar to them. Operating tenders, using flares, bilge pumping devices etc are not second nature like a professional mariner. The experience levels of hire and drive users' needs to bare heavily on any decisions AMSA makes. 2. Any equipment based outcomes need to take in to consideration Hire and Drive Fleets within the country not just the Whitsundays. 3. Any option which requires the tender to carry flares is a good outcome. Most anchorages have offshore breezes blowing across them to it would be fair to say that if a tender broke down it would or could get blown out of the anchorage. With this in mind any equipment lists that have flares as part of the equipment is a good move. 4. The reference of "where the tender is able to communicate with the parent vessel" is largely a useless comment. It is fair to say that generally the entire compliment from the parent vessel will be in	Thank you for your review. AMSA agrees this is forefront of mind when considering this matter. AMSA agrees. The standard will continue to require the carriage of distress signals in remote enclosed waters and >2nm from land. In considering the varying scenarios of how a tender may be used, and your example, AMSA have not progressed with the alternative that mentioned the ability to communicate with the parent vessel.

Comment No.	Provision / Clause	Committee member responses	Response to submission
		the tender if they fit. For example if it is 2 people using a hire and drive vessel, it's fair to say they will leave the vessel and go ashore together. One won't go to the beach and leave the other on the vessel, same with family groups etc. Alternative 2 would appear to give a good level of support towards achieving a good safety based outcome for Hire Drive Class 4 Vessels, whilst Domestic Commercial Vessels Alternative 3 would work well. Would AMSA consider putting 2 different tables in, 1 for class 1,2 and 3 vessels and one for Class 4 Hire and Drive, given that trained, qualified professional operators generally operate the Class 1, 2 and 3 vessels and untrained amateurs operate the Class 4's with little or no experience and therefore a higher level of risk. The separate compliment of Lifejackets should be required to be carried on these tender but in my opinion should be a type of jacket that are not as large and cumbersome as a Coastal Multifit and should be no more than a small collapsible buoyancy vest as has been listed. By having them in the tender they should never be forgotten or left out, particularly during an emergency.	In an effort to provide simplicity and reduce possible areas for confusion, the standard will only have one tender equipment table. AMSA has tried to consider all the matters mentioned in your response when finalising the table. AMSA agrees and is committed to promoting safety on the water and improving safety culture, and this includes the carriage and wearing of lifejackets. As such, after reviewing the submissions and considering other matters including coronials and marine incidents, the standard will continue to require the carriage of lifejackets on all vessels including tenders
4.	Safety Equipment table for tenders	• Netting—tenders for this work are usually operated in waist high water and a PFD may not be necessary. • Fish spotting—tenders for this work are usually operated alongside the shore so a PFD, flares and EPIRB may not be necessary. • Sand/mud crabbers—tenders for this work are usually operated in a bay so an EPIRB is probably not required. PFD and flares are OK. • Ocean net fisheries—tenders for this work are usually operated 150 yards away from the shore so no EPIRB or flares. PFD is probably OK due to risk of roll over.	Thank you for your submission. We have considered your comments in relation to flares not being necessary where the tender is operating alongside the shore. We have updated the equipment table for tenders so it now requires that the carriage of distress signals is only required where the vessel operates in remote enclosed waters and greater than 2nm from land. AMSA is committed to promoting safety on the water and improving safety culture, and this includes the carriage and wearing of lifejackets.
5.	Safety Equipment table for tenders	Thanks for the e-mail. The below {proposal} looks fine to me, it does not really effect my neck of the woods so will leave comment to my fellow experts.	Thank you for your review.

Comment No.	Provision / Clause	Committee member responses	Response to submission
6.	Lifejackets and diving operations	Divers in tenders being transported to dive sites cannot physically don a lifejacket. However, their dive equipment will do the same job. Just need some ruling / clarification on life jacket requirements in this instance. Having to carry jackets in addition to dive equipment is a worse situation than the issue in the Whitsundays and will apply nationally.	Thank you for your submission. This will be clarified in the standard.

In finalising the standard, AMSA has considered the following in relation to the matter:

- the differing equipment requirements for hire and drive vessels in the states and Territory prior to the National System;
- the views presented during public consultation;
- the subsequent submission by the industry association;
- discussions with and responses from the industry advisory Committees;
- the recreational safety equipment requirements in all the jurisdictions (where in most jurisdictions lifejackets are required to be carried and in some jurisdictions lifejackets are also required to be worn especially on smaller vessels, or when 'at risk' – ie operating alone, at night, crossing bars, etc.);
- numerous coronial findings;
- marine incidents; and
- numerous papers and findings on the criticality of lifejackets in preventing deaths in the water.

Whilst it is understood that differing requirements may have applied in the states / territories prior to the National System. The intention of this review of the standard is to provide a nationally consistent standard for domestic commercial vessels. Also, the current standards that apply to tenders (NSCV Part F2 made in 2010 and NSCV Part G made in 2012) **both currently** require the carriage of lifejackets.

When considering the carriage of safety equipment generally, and especially lifejackets, AMSA is committed to promoting safety on the water and improving safety culture, and this includes the carriage and wearing of lifejackets. In recognition of the submission and responses received, the tenders equipment list was updated to incorporate:

- that the carriage of distress signals is only required where the vessel operates in remote enclosed waters and > than 2nm from land; and
- that only mechanically propelled tenders require a secondary means of propulsion.

The equipment list for tender will continue to require a separate complement of lifejackets to be carried on all tenders regardless of class. They will not be permitted to be taken from the parent vessels complement of safety equipment.