

**Frequently Asked Questions (FAQs) about the proposed new AMSA
'Tinny to Tanker (T2T)' Seafarer Certificates (18 August 2009)**

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General

1. What is the purpose of the proposed new AMSA T2T Seafarer Certificates?

Answer: The proposals are for a complete suite of AMSA certificates to cover all Australian seagoing qualifications from near-coastal to unlimited, including the fishing industry; and all to be in compliance with STCW and STCW-F.

2. What are the advantages to the State seafarer?

Answer: T2T is intended to offer near-coastal certificates that are more readily acceptable to the different states and territories of Australia. They ensure STCW compliance at near-coastal level; and should lead more easily to the unlimited certificates without unnecessary barriers to progression. This progression is directly linked to the AQTF/TLISC Maritime Training Package (MTP) and sea-time has been rationalised to be better attainable.

3. Is T2T part of the Single National Maritime Jurisdiction (SNJ) that is currently under discussion?

Answer: T2T is the proposal for the revision of MO3 and was underway before the SNJ project. T2T will proceed through the MO3 revision process regardless of the outcome of SNJ. However, T2T is supportive of a SNJ and would sit very comfortably within a SNJ.

4. Where can I get more information?

Answer: Further information can be found on the AMSA website at [Tinny to Tanker](#) or by emailing T2T@amsa.gov.au.

Revision of Marine Order Part 3

5. What is the timescale for T2T and the MO3 revision?

Answer: The MO3 revision is already started administratively and is anticipated to enter public consultation in late-2009. Implementation could be expected in early 2010. For comparison the target date for SNJ is 2013.

6. Will there be further amendments to MO3?

Answer: This is possible as amendments could be required as a consequence of the revision of STCW planned for 2012. MO3 could also be amended if necessary in the light of experience of implementing T2T.

Consultation

7. What industry consultation has gone into these proposals?

Answer: The present draft is the result of several years of consultation with industry through AMSA attendance at meetings with IMO, NMSC, State MSAs, TLISC and RTOs, Customs, RAN, industry peak bodies, shipping organisations, seafarer organisations, sea-riding and sea-service by AMSA staff, and ongoing communications with individual seafarers. In particular, the proposals have taken

account of the consultation that was undertaken for a review of NSCV Part D. A series of consultative meetings were conducted in all States/NT during April 2009. This draft will now go through the full public consultative process for the revision of Marine Orders Part 3.

8. How will T2T affect the fishing industry?

Answer: T2T only affects the fishing qualifications by offering an AMSA option. Below 45 metres in the near-coastal EEZ, and below 24 metres outside the EEZ, the T2T qualifications will be combined fishing and non-fishing certificates. For the very few larger fishing boats, the T2T certificates will anticipate STCW-F. Apart from international fishing voyages which are already with AMSA, all other aspects of fishing remain with AFMA and the states/NT.

9. What consultation was done with the fishing industry?

Answer: The Australian fishing industry is diverse but the representatives of sample sectors have been consulted with at NMSC conferences, TLISC meetings, and other forums. In addition there has been higher level consultation with ATSB and through the IMO and ILO, and at STCW-F meetings. The outcome has been full acceptance of fishing vessel seetime for non-fishing certificates; coordination of fishing and non-fishing MTP and T2T qualifications; and alignment with STCW-F (and the Torremolinos Protocol). Nothing additional has been imposed upon the fishing sector by AMSA.

10. Can I make comments and contribute to the development of T2T?

Answer: The means for this is to monitor the AMSA website for the revision of MO3 which will implement T2T, and to comment upon those MO3 proposals. When possible, comment is preferred from representative organisations rather than individuals. .Very importantly, comment should also be on areas that are supported, as well as comment requesting change.

Seetime and Other Requirements

11. Why is seetime still required under competency based training and assessment?

Answer: The certificates are STCW and STCW-F compliant and seetime is specified in those Conventions. Seetime is a means of gaining competency and a powerful assessment tool. However, the amount of seetime required by T2T has been rationalised based upon ensuring the quality of that seetime, and these changes should address any questions about unnecessary or excessive seetime requirements.

12. How will seetime be checked under T2T?

Answer: Seetime gained in near coastal waters will be checked more rigorously under T2T than at present, given there will be reductions in the amount of seetime required. The use of log books and training record books will be important in assessing seetime.

13. Are there restrictions on the flag under which seetime is gained for T2T?

Answer: There are no restrictions either at present or in T2T of the flag under which seetime is gained. However it is particularly important that if sea service is gained on a foreign ship a letter is obtained from the owner or operator of that ship confirming the sea service gained on board the ship.

14. Does seetime in submarines count under T2T?

Answer: This topic is still under discussion.

15. When is seetime counted in hours and when in months and years?

Answer: Seetime is counted in months and years for larger vessels and under STCW and STCW-F. For smaller vessels T2T continues the NSCV Part D practice of counting experience in hours. There is generally no need to convert hours into months; and excessive daily entries would be questioned for relevance by examiners.

16. When is vessel size measured in GT and when in length overall?

Answer: Size is measured in GT under STCW and for larger vessels; and in length for STCW-F and smaller vessels. At the boundary between smaller and larger vessels, seafarers can choose to use either 80 GT or 24 metres length overall. The Master near coastal <500 GT will be valid up to 45 metres on fishing vessels. No other GT/length conversions are required. Engine power is always in kilowatts.

17. Where are the distances offshore measured from?

Answer: The 3 nm State jurisdiction, 12 nm Territorial Sea, and 200 nm EEZ are measured from a "base line" under the UN Convention on Law of the Sea and the limits are often shown on nautical charts.

18. Will AMSA orals still be required for T2T certificates?

Answer: AMSA orals will definitely still be required for all T2T certificates from Master near-coastal <500 GT upwards and from Chief engineer Near Coastal (<750 kW) upwards. For the entry level near-coastal certificates there could be flexibility in how the final assessments are conducted.

19. Can recreational experience be counted towards T2T certificates?

Answer: T2T continues the NSCV Part D acceptance of recreational experience for entry level near-coastal certificates and accepts 100% recreational experience for Coxswain (sheltered waters), up to 50% for Coxswain, and up to 25% for Boatmaster.

20. Will the T2T proposals include medicals and revalidation for near-coastal certificates?

Answer: This detail is still under discussion but will take the NSCV Part D requirements as a starting point for both medicals and revalidation of near coastal certificates.

21. What about local qualifications such as local knowledge and bar crossing endorsements under T2T?

Answer: T2T does not include these local requirements, although the general background knowledge will be covered by the MTP courses. These local requirements remain with the local port or state/NT authorities.

22. What about local pilot qualifications under T2T?

Answer: All local pilotage requirements and qualifications are outside of T2T and unaffected by T2T.

RTOs and Training

23. How does T2T affect the TLISC Maritime Training Package?

Answer: The MTP is used as the backbone of the T2T certificate structure. No immediate changes to the MTP are required to implement the STCW qualifications in T2T. However the STCW-F qualifications will require future development based upon the IMO model courses, and there will be minor changes through the normal ongoing revision process of the MTP. T2T does not affect the current MTP which has only recently been implemented by the RTOs; and which is currently accepted by both AMSA and by the states/NT.

24. Where does the course detail for the MTP come from?

Answer: Wherever possible, AMSA recommends the use of the IMO model courses to provide the detail for the MTP and to assure AMSA of compliance with STCW and STCW-F.

25. Will RTOs require AMSA approval to participate in T2T?

Answer: If RTOs only wish to offer MTP qualifications for state/NT certificates then they may continue to do so. However, if RTOs wish to offer qualifications for AMSA T2T certificates then they will have to apply for approval from AMSA. AMSA will provide, on request, the password to the RTO-only part of the AMSA website where the requirements for approval are detailed. It is a requirement to be an RTO before seeking AMSA approval.

26. How can seafarers join the T2T system if their training was not done at an AMSA approved RTO?

Answer: Seafarers can take their non-approved training to an AMSA approved RTO and request recognition of their previous training. Alternatively, seafarers can wait until they are ready to upgrade their qualifications and ensure they then train at an AMSA approved RTO and join the T2T system at a higher level.

27. What should I do about my current study plans?

Answer: T2T is based upon the TLISC MTP qualifications that are already offered by the maritime RTOs. This is the same MTP that both AMSA and the states/NT currently use. Regardless of the proposed T2T changes, your route to a higher certificate of competency, under any system, is by studying for a higher MTP qualification. However to ensure that qualification is acceptable to AMSA and under T2T, the study should only be undertaken at an RTO that is approved by AMSA for that qualification. If the RTO is not AMSA approved for that qualification, you will not be eligible for a T2T qualification unless you get your non-AMSA approved training recognised at an AMSA approved RTO, or wait until you retrain for a higher qualification at an AMSA approved RTO.

28. Is distance education and recognition of prior learning and current competencies accepted in the T2T proposals?

Answer: Yes. AMSA accepts the AQTF MTP - and the AQTF allows for both distance education and recognition of prior learning and current competencies. For distance education, AMSA requires the normal standards to be satisfied and for the education mode to be appropriate.

29. Can AMSA advise me personally about what T2T qualification I am eligible for?

Answer: AMSA is sorry, but does not have the resources to be able to offer personal advice beyond what is already in these FAQs; and in any case has to be very cautious about offering advice on what are still just proposals.

State/NT Recognition of AMSA MO3 Near-coastal Certificates

30. How will T2T affect the issue of State certificates?

Answer: T2T does not address the issue of State certificates as T2T will be introduced as an alternative national system offered by AMSA. The two systems will initially exist in parallel and seafarers will be able to hold and use either, or both, qualifications.

31. Will the AMSA near-coastal certificates really be accepted in every Australian State and territory?

Answer: The intent of these proposals is that the T2T certificates will be more readily accepted in each state and territory. Initially the states may require to amend their legislation and administration to ensure this; but the national use of maritime qualifications is a COAG (Council of Australian Governments) policy and COAG can be expected to support the use of AMSA T2T near-coastal certificates in every state and territory of Australia.

32. What happens to seafarers who hold state USL or NSCV Part D certificates?

Answer: Initially, Part D/USL certificates and everything those certificates permit them to do remain a State/NT matter. Seafarers may wish to obtain AMSA T2T certificates as well, and there will be transitional arrangements in MO3 to facilitate this.

33. What will my current state/NT NSCV Part D certificate become in the new T2T system?

Answer: Your current NSCV Part D certificate is a state/NT issued certificate and remains with the state/NT. The T2T proposals do not immediately replace state/NT certificates or what your state/NT certificate allows you to do. You will see roughly equivalent AMSA certificates in the T2T proposals; and there will be transition arrangements. When the draft detail of these transition arrangements has been developed for the revision of MO3, they will be published on this T2T website.

34. Since T2T was proposed, a separate COAG initiative is the National Licensing System which will only allow for one licensing system, applying to all the Australian States/NT. How does this effect T2T?

Answer: AMSA itself has always said that T2T would just be an option and this is how the revision of MO3 will be drafted. However COAG (Council of Australian Governments) now says that, as with all other industries, only one national maritime certification system will be allowed by 2013, and one option would be T2T – with existing State/NT certificates allowed to continue in force until they expire.

35. Why have the T2T certificates got slightly different sizes of vessels and operating areas to USL/Part D certificates?

Answer: The T2T certificates are compliant with STCW and STCW-F and are generally updated. They do not continue the old ACMW and UDO areas as there is no longer any legislation to support those areas – although they may remain upon older certificates. The old AMSA STCW endorsements were also slightly different to the Part D certificates they endorsed.

36. Are the T2T certificates better than the old USL/Part D certificates?

Answer: Overall yes, because on balance, and as a package, the T2T certificates will allow more than the old USL/Part D certificates. More importantly, the T2T certificates facilitate advancement to higher level T2T certificates which do offer more.

37. Are there any residual barriers to progression in the T2T proposals?

Answer: T2T has been carefully drafted to ensure that each certificate allows the holder to gain the seetime necessary for the next higher certificate. However if any seafarer believes any barriers still exist, then they should advise AMSA who will address the matter if it is at all possible.

38. Is there any risk of “dumbing down” qualifications or of reducing them to the lowest common denominator?

Answer: The proposed new qualifications will be quality assured by the standards of STCW and STCW-F; by the standards of AQTF through the RTOs and State education authority (VETABs); and by AMSA. The focus on seetime will be on quality seetime that is supported by training programmes and by the proper logging of experience

Overseas Recognition of MO3 Certificates

39. Can the T2T certificates be STCW endorsed?

Answer: As many of the T2T certificates as possible will be fully issued under STCW and STCW-F and will therefore automatically carry an STCW and/or STCW-F endorsement.

40. Will the near-coastal T2T certificates be in compliance with STCW and STCW-F?

Answer: Yes. AMSA will take full advantage of all the flexibilities allowed in both STCW and STCW-F for both smaller vessels and for near-coastal waters to ensure Australia can comply with both Conventions without exceeding the international requirements.

41. Will the T2T certificates be recognised overseas?

Answer: It is up to overseas administrations whether they recognise other countries' certificates, but AMSA has agreements with many countries to facilitate this and these are listed:

http://www.amsa.gov.au/Marine_Qualifications/Certificates_of_Recognition/

The fact that T2T near-coastal certificates will be issued by the national administration (AMSA) under STCW and STCW-F will strongly support their recognition by other administrations.

Special Vessels

42. Does T2T offer sailing vessel qualifications?

Answer: STCW does not require sailing vessel qualifications but the current MO3 and NSCV Part D both do. AMSA is proposing the addition of a sail certificate, at the Boatmaster level, that would be based on YA qualifications. – including YA recognition of RYA qualifications.

43. Have the needs of paddle steamers and other heritage vessels been considered in T2T?

Answer: This area is still under discussion with the primary consideration that these irreplaceable vessels and their fare-paying passengers be operated to the same safety standards as other vessels. While any discussions continue, these vessels are able to continue to be operated by seafarers under the state/NT systems.