



**Minutes of meeting between Australian Maritime Safety Authority (AMSA)  
and Recognised Organisations**

**0900 – 1445 hrs Wednesday 14<sup>th</sup> October 2015**

**Attendees**

|                                   |   |
|-----------------------------------|---|
| Paul MacGillivray (PM) – Chair    | AMSA, Principal Advisor FSC Implementation, SS      |
| Kevin Porter (KP)                 | AMSA, Principal Marine Surveyor FSC, SS             |
| Alex Schultz-Altmann (ASA)        | AMSA, Manager, Ship Inspection & Registration, SS   |
| Bonnie Daniel (BD) – Minute Taker | AMSA, Admin Coordinator, Ship Inspection & Reg, SS  |
| David Penny (DP)                  | AMSA, Manager, SSD East and North, SS               |
| Greg Witherall (GW)               | AMSA, Principal Marine Surveyor, Brisbane North, SS |
| Craig Hughes (CH)                 | American Bureau of Shipping (ABS)                   |
| Tony Edwards (TE)                 | Bureau Veritas (BV)                                 |
| Wade Henson (WH)                  | Bureau Veritas (BV)                                 |
| Florin Zaharia (FZ)               | Bureau Veritas (BV)                                 |
| Zili Chen (ZC)                    | China Classification Society (CCS)                  |
| Rodney Humphrey (RH)              | Det Norske Veritas - Germanischer Lloyd (DNVGL)     |
| Gu Jung-ho (GJ)                   | Korean Register of Shipping (KR)                    |
| Alan Williams (AW)                | Lloyd's Register (LR)                               |
| Dean A. Biskupovich (DAB)         | Lloyd's Register (LR)                               |
| Takashi Nakamura (TN)             | Nippon Kaiji Kyokai (NKK)                           |
| Y. Nakayama (YN)                  | Nippon Kaiji Kyokai (NKK)                           |
| Anoop Rajendran Nair (ARN)        | Registro Italiano Navale (RINA)                     |
| Subrata Das (SD)                  | Registro Italiano Navale (RINA)                     |
| <b>Apologies</b>                  |   |
| Weidong Lin                       | China Classification Society (CCS)                  |
| Jong-Eun Choi                     | Korean Register of Shipping (KR)                    |

### **Item 1 & 2 – Welcome and Housekeeping**

GW – Welcomed all the RO representatives and covered OHS matters related to the venue.

### **Item 3 – Opening remarks from Alex Schultz-Altmann**

ASA – Welcomed RO representatives and informed that he had just returned from the TMOU meeting in Malaysia and what came out of that with large ship owners there is a desire to get closer to the Port State authorities so their relationship with AMSA is going to improve in that area. Marshall Islands have opened an office in Brisbane to improve their performance, which is proving to be successful.

ASA – Informed that the Australian fleet isn't growing particularly and AMSA are looking at some challenges within the industry. Class NK are looking at the carriage of bulk liquid hydrogen on board ships, which is the new thing going through IMO now. There are gas powered ships coming onto the Bass Strait trade that are being built in Germany, using a novel system of fuelling. The IGF code is now coming in to effect so AMSA need to look at how we will manage this.

ASA – Outlined the main topics for discussion. There is a big issue going on from both a Flag State and Port State perspective with regard to cargo. At the last meeting of IMO CCC liquefaction was discussed. If ROs are looking at coal, out of 105 cargos tested only 15 presented no liquefaction risk. So the science around what AMSA do is changing rapidly. There are challenges for AMSA regarding our own Flag State performance and trying to improve as AMSA have a fairly old fleet. Our Port State performance is important to AMSA. Another issue is legislative change to Marine Order 43 and whether or not ROs are willing to take on plan approval for livestock ships. AMSA has a broad range of legislative change going on at the moment; all marine orders are being updated due to new Navigation Act. There have been some challenges in that, so if ROs do pick up on any issues or see problems with a marine order, please let AMSA know. AMSA will give draft marine orders to the ROs before going out for public consultation, so please provide feedback.

### **Item 4 – Review/acceptance of RO Meeting minutes October 2014**

The minutes had been circulated prior to the meeting. Minutes from the previous meeting were accepted with no objections.

PM – Update regarding item 10 (Certificates / Statements of Compliance) whereby AMSA agreed to look at separating record of equipment from certificates of survey for passenger vessels, cargo vessels and fishing vessels.

KP – As requested the current published forms in Marine Order 31 have been split into their respective certificates and supporting records of equipment. These were forwarded to ROs for comment during the meeting. RO feedback post meeting appreciated. It is hoped that the ROs will incorporate them into their databases at the earliest opportunity, once any issues have been satisfactorily addressed and the documents made available on the 'restricted access area' of the AMSA website.

### **Item 5 – Plan Approval – Livestock Carriers (MO43)**

ASA – AMSA received a request from RINA asking if they can do plan approval for livestock ships. Livestock ships are complex and AMSA reviews their design in order to ensure they have adequate redundancy. They are required to have duplicate systems and there must be enough systems that no single failure will cause a loss or degradation of a service below that required by the marine order. He informed it will be a complex task and there is an influx of livestock ships coming online at the moment.

ASA – AMSA will provide a 40-page checklist and in that checklist there will be everything AMSA expects to see in that vessel. Every vessel will need to comply with the minimum requirements. AMSA proposes that ROs do the plan approval and charge their rates for it and AMSA will do the final inspection and issue the certificates.

ASA – Stated it is a complex process and there are currently about 10 vessels and more coming on line. The trade is increasing in Darwin and Townsville and going to get bigger. It won't be a normal delegation and will still have a lot of AMSA engagement, but AMSA would like to get a feel for what ROs think before writing a procedure.

ROs – Indicated that they would be willing to take it on, but would like an understanding of what sort of delegation will be given to them. There was general acceptance, subject to AMSA agreement and instructions.

ASA – AMSA need to formalise the agreement across the board for everybody. AMSA need to circulate checklist and make sure it is clear and once developed AMSA can look at full delegation for the full plan approval.

ASA – Informed the new marine order needs updating to reflect the airflow changes. There are no huge changes to the marine order except problems are developing with drainage as the ships grow and there needs to be more focus on stability. There are requirements for ROs to provide certain documentation to AMSA, including plans electronically. So all the plan approval will go directly to Class. If anything doesn't fully comply, it must come back to AMSA for final approval, inspection and certification. AMSA is still wondering about annual endorsement and whether AMSA will hand this to ROs or if AMSA will continue to do it. AMSA would like to seek RO opinion on this issue and possibly in the future AMSA might hand over certification as well. AMSA will only modify RO agreement for those who want to do it, but it is available to all.

**Action: AMSA to send out livestock carrier plan approval checklist and draft procedures to ROs for comment.**

#### **Item 6 – Approval of stability computers**

PM – informed that ROs may have received an email from Rob Gehling on the 22nd of September 2015. This was in response to a request received from Class NK about carrying out the approval of stability computers. This is in response to changes to MARPOL Annex 1 and the IGC, IBC and BCH codes regarding provision of damage stability computers, which will become mandatory from the 1<sup>st</sup> of January 2016. Rob Gehling had drafted in the Instructions to Class a new section 19.4 (stability computers) and circulated to ROs for comment. AMSA has received about 3 comments, but no one has had any issues with the draft. PM asked if everyone was happy with what Rob has proposed, and if so AMSA will update the Instructions to Class accordingly. RO response was positive.

**Action: AMSA to add new section 19.4 (stability computers) to the Instructions to Class.**

#### **Item 7 – Review of Marine Orders (52, 58 and 60)**

ASA – Stated that the word 'commercial' in the draft Marine Order 52 is confusing and has been removed. MO 52 will apply to super yachts, motor and sailing yachts of less than 24 metres and training vessels, both sail and motor. LY3 applies to all yachts above 24 metres. MO 52 is drafted in accordance with LY3 and there will be a national annex as well. The difference between LY2 and LY3 is MLC and LY1 is gone. Fundamentally AMSA will work to LY3 because MLC is a requirement. For existing yachts, ROs can do a gap analysis and that is built in to the order. For vessels less than 24 metres AMSA will apply NSCV or the marine orders as applicable to the sort of vessels they are. Training vessels can only carry 12 passengers, but can carry more trainees (the trainee provisions are within the body of the order). He informed that if there is any change to LY3, AMSA will seek RO input.

ASA – Informed that because of these changes AMSA anticipate a number of Australian-owned yachts coming back from foreign registry; however, the challenge is some of them haven't been LY3-certified before or they are not fully compliant. In this case a gap analysis will need to be done. All new vessels

from the application of the order should comply with LY3 and any existing vessel transferring across again, AMSA will have to look at the gap analysis.

ASA – Informed that the National Annex is almost complete. The only thing the National Annex does is point to our legislation or our order where applicable, as opposed to the UK requirements. Where AMSA uses different definitions these are addressed in the National Annex.

ASA – Informed that with LY3 there is new Marine Order 74 coming out, which is for the qualifications of the master and crew on large commercial yachts. This was agreed because AMSA has found that about 30% of the crew on these yachts are Australian.

**Action: AMSA to circulate the revised Marine Order 52 to ROs during public consultation phase.**

ASA – Certification for a LY3 yacht will be a standard SOLAS or NSCV certificate based on size of the vessel plus a certificate of compliance to LY3.

KP and ASA – On the screen a draft form of a proposed ‘Certificate of Compliance for a Large Yacht’ which would be issued for a yacht that is over 24 metres was displayed.

KP – Advised that this is the supporting compliance document for large yachts, built in accordance with the LY3 Code and the supporting Australian National Annex. ASA said LY3 Code does cover training vessels both sail and motor. The certificate makes it clear as to what the vessel has been approved to and also picks up ‘short range yachts’ as defined by the LY3 Code as well. ASA indicated that if a short range yacht transits with crew, (without passengers/ guests or cargo), and it operates within foreign waters with limitations, AMSA is happy with that, but AMSA needs to make it clear to port State authorities that they are allowed to operate in that manner.

KP – On the screen a draft form of the Australian National Annex to the LY3 Code was presented. It was advised that AMSA has adopted the same approach as the UK MCA, which means that the Australian National Annex is to be read in association with the LY3 Code.

ASA – Stressed that when approving recreational super yachts over 400 tonnes or carrying more than 15 persons, MARPOL still applies. That would also include foreign recreational motor yachts coming in to Australia and which are subject to PSC.

KP – Where the Australian National Annex is silent in any aspect or section, ROs should comply with the requirements of the LY3 Code. There is a recommendation that large Australian recreational vessels also comply with the LY3 Code. There is still some discussion about minimum age, but it is suggested that 16 may be the minimum. If less than 16 a guardian is required unless measures are put in place for the protection of minors. This is something that will be looked at later. At the moment the target date for the new Marine Order 52 is the 1<sup>st</sup> of January 2016, but AMSA Ship Safety is still waiting on the revised draft to come back from legal.

#### **Discussion regarding helicopter installations & submersibles**

ASA – Informed that AMSA is not going to get involved in approving flight decks and submarines. AMSA will deal with these on a case by case basis. Finding a relevant standard is the challenge. If necessary, AMSA would refer it back to the Red Ensign reference group and suggest they include it in the Code and what applies to the relevant code.

KP – Informed that Lloyds have class rules for offshore submersibles.

KP – Advised that there is one proposed alteration from the AMSA ISM team. For yachts that are over 500 GT AMSA will continue ISM. For yachts less than 500 GT, the proposal is to delegate the ROs to undertake the Safety Management certification on these yachts.

KP – Requested any initial feedback on what had been presented. No comments.

KP – On the screen, Tables 1 and 2 of the draft Australian National Annex were displayed. It was advised that these Tables are most likely to be used by the ROs for quick reference. The tables address all certification required for yachts, documents and all the references to corresponding marine orders. The tables also include yachts less than 24 metres. The aim is to make the tables a ‘one stop shop’ so industry understands the full range of documents and certificates that a yacht requires. AMSA has included links in those areas where AMSA has no jurisdiction, i.e. port security and ballast water/ bio fouling.

Referencing Table 2 it was advised that this is for additional supporting certificates and documentation as indicated. The Wreck Removal Convention was highlighted, noting that whilst Australia is not a signatory, Australian registered yachts over 300 GT transiting the waters of a country that is party to the Convention do require the relevant insurance. AMSA published Marine Notice 2015/04 and the link has been provided. Bunker certification requirements are also included.

KP – Informed that the document is in the final stages subject to the amendments. It will go back through legal and then be paired with Marine Order 52. The final draft will be sent to the ROs for review.

KP – A draft ‘Certificate of Survey for a Yacht/ Large Yacht’ was presented. In producing the draft, AMSA is seeking to maintain the same certificate format as issued under MO 31, but with a bit more detail. Main changes being the identification of vessel type, identification and link to MO 52 within the certificate and the ‘Certificate of Compliance for a Large Yacht’ subject to the LY3 Code and Australian National Annex.

#### **Marine Orders 60 and 47**

ASA – Informed that MO 60 involves FPSO’s, FSU’s and now FLNG and AMSA is going to amalgamate MO 60 into MO 47. The reason AMSA is doing this with non-disconnectable FPSO’s, FLNG’s and others is that AMSA is trying to provide access to the MODU Code requirements for things like LSA and communications because it is a better fit. The other big challenge is MLC for these vessels. AMSA has taken the view that when units have accommodation without windows, because it is a blast area, this is the safest thing to do and AMSA will look at better recreational facilities, for example. The problem is the MLC doesn’t give AMSA a lot of scope for exemptions, so we simply state that AMSA has approved such changes in the DMLC Part I. Also a seafarer isn’t necessarily crew. A seafarer is someone paid by the owner on the vessel. The determination of seafarer lies with the Manager Ship Operations and this is done on a case by case basis.

#### **Marine Order 58**

KP – Informed that as the ROs are probably aware there is a gap in the requirements for vessels that are less than 500 GT. MO 58 is currently written for vessels that are over 500 GT and the current review and the draft is seeking to address the gap with vessels that are less than 500 GT, to ensure they have some form of SMS in place. This recognition has come about in part as a result of LY3 Code section 30 which deals with vessels that are less than 500 GT for their Safety Management System. AMSA is aiming for consistency.

ASA – Informed that the other marine orders that AMSA is looking at is 42 and 44 – container weight verification. AMSA is trying to find a process, whereby AMSA is looking at applying standards and making the ship comply with those standards. MO 34 is being revised. AMSA will put out a discussion

paper shortly and for those who wish to attend there is a meeting 3<sup>rd</sup> week of November. Marine order revision needs to be completed by July 2016.

ASA – advised MO 34 is being revised.

MO 33 for grain will be coming out shortly.

MO 17 is up for review – should come out to ROs for comment shortly.

MO 12 is up for review.

MO 21 is up for review to bring it in line with the new Navigation Act.

### **Morning tea at 10:30**

#### **Item 8 – Extending dry docking intervals**

KP – On screen presented MO 31, section 40, paragraph 43. The section was included in the marine order as a potential ‘future proofing’ regarding the possible introduction of EDDI’s and drew attention to the keywords in paragraph 3 that it indicates “in force”.

ASA – Explained that AMSA currently has a request for an extended dry docking interval for a new build. The problem is the difference in interpretation on what extended dry docking means. However, there are a number of ROs that have rules for extended dry docking and the application is different between ROs, which is an issue. If AMSA is going to go down this path there has to be a common approach and AMSA wants procedures to be formalised. IACS needs to take the lead in this and AMSA wants action from IACS and Class Societies for unified interpretation. AMSA is in agreement in principle but something needs to be formalised and if there is any objection at IMO, then it is not happening. AMSA will agree to a unified interpretation or a common scheme in place. AMSA wishes to prompt IACS to have a unified interpretation or a common scheme that AMSA can apply. AMSA asks the ROs to go to IACS and put pressure on them to accomplish this, but this needs to be done before the next IMO III subcommittee meeting in 2016.

**Action: FSC to draft a letter to each of the ROs outlining the issue and where AMSA sees itself with this with the view to developing a common approach (unified interpretation) between IACS members that can be taken to IMO.**

KP – On screen presented the Dept. of Agriculture document ‘*Anti-fouling and in-water cleaning guidelines*’. Operators considering EDDI need to review the document regarding in water cleaning and maintenance in relation to an EDDI program in Part 2, section B, Guidance on in-water cleaning, para 6. AMSA has no objection to operators developing proposals, provided all the requirements can be satisfactorily addressed.

#### **Item 9 – MLC compliance**

PM – Advised that this refers to vessels between 200 and 500 gross tonnes. A new Marine Order 11 came out in May and although the content of the order hasn’t substantially changed AMSA placed the maritime labour certification aspect at the end. Any vessel that is a regulated Australian vessel over 200 gross tonnes must comply with the MLC. This means that even if they don’t need to be certified, i.e. vessels  $\geq 500$  gross tonnes they need to be inspected and need to comply with ALL the MLC requirements and not just the 14 areas that are covered in MLC Appendix A5-1. Even for DCVs to which the MLC doesn’t apply, if they have to go to a foreign port for routine dry docking because there is no dry docking space within Australia, as soon as they go beyond the 200 nautical mile limit they are a RAV and they must comply. If they are over 500 gross tonnes they need to have MLC certification. The ship owner must draft a DMLC Part II, which has to be reviewed by the RO, then the vessel must be inspected and the DMLC Part II endorsed by the RO. When AMSA receives the endorsed DMLC Part II and the inspection report from the RO, it will issue the DMLC part I. The RO is then authorised to issue a Maritime Labour Certificate. If the vessel is less than 500 gross tonnes, it doesn’t require the full MLC certification; however, the vessel must comply, and it must show proof of compliance. AMSA

recommends to ship owners that at the very least they carry an endorsed DMLC Part II and the RO's inspection report. Of course, the ship owner can request full MLC certification if they so wish, in which case AMSA will issue the DMLC Part I, provided all requisite conditions are met.

#### **Item 10 – Certification, RAV vs DCV**

ASA – Explained what makes a vessel a RAV. The vessel has to be an Australian vessel, but it doesn't mean it has to be registered as an Australian vessel. It just has to be eligible for registration. If it is overseas or intended to be going on an overseas voyage, it is a RAV. If it has certificates issued that are safety certificates, it's a RAV. ROs can have RAVs which are certified for only domestic operations. If ROs have a vessel with DCV certification and Navigation Act certification, then the DCV certification is suspended / null and void. If ROs have a DCV operating beyond the EEZ without some sort of approval, the certification is null and void as soon as they go across that line; they are RAV. The line for the Navigation Act is the EEZ.

ASA – Explained what a section 19 declaration is. It is applied mainly to fishing boats. The vessel will continue to be a DCV operating within certain limits; they can't go in to the port of another country.

An example of a Navigation Act 2012 Section 19 Declaration was provided on-screen for reference.

#### **IOPP arrangements and oil filtering equipment and SOPEPs**

KP – Informed the group that earlier in the year a letter was sent out in regards to certification for the waiver provisions for isolation of OWS systems fitted to RAVs operating in restricted waters and ports or potentially transferring between Australian ports due to commercial considerations. It was advised that the document will be updated to clarify that the waiver only applies to RAVs operating in local waters.

The ROs agreed that the provisions of the letter should be included within the ITC.

**Action: AMSA to revise / re-issue letter 23 June 2015, Trim ref: 2010/893, include this procedure within the ITC and send out for comment.**

#### **ISPP arrangements for vessels <400 GT**

KP – Vessels require some form of holding tanks. States and Territories have some strict requirements about their environmental protection laws with discharging sewage in their waters. There is guidance published regarding the sizing of holding tanks and with regards to the amount of grey and black water produced, determining sizes of tanks and arrangements on passenger ships. Some operators have asked AMSA to determine the output size of the tank.

ASA – There is no exemption for MARPOL Annex IV on dumb barges and sewage compliance. If they are over 400 GT even if there isn't anyone on board they need to be issued with an ISPP.

**Action: AMSA FSC to provide the guidance link to ROs as well as AMSA SS managers and update the ITC with regards to the sewage requirements.**

KP – MARPOL: Subject to State and Territory provisions, DCV's are also subject to Marine Order 97, giving effect to MARPOL Annex VI, air pollution and prevention. AMSA has recently been working with several ROs classing vessels that are certified as DCV's and are fitted with engines over 130KW. Some DCVs are seeking certification as a RAV when requested to provide the appropriate engine international air pollution prevention certificates (EIAPP). Attending surveyors are unable to do so.

This issue is one that will be further addressed at a forthcoming meeting between ROs and the Domestic Vessel team.

### **Change of flag – 1969 International Tonnage certificates**

KP – Vessels undergoing a change of flag are covered by Article 10(3) of the '69 International Tonnage Convention. A vessel that is over 24m in tonnage length requires a Tonnage Certificate as part of the registration process. A foreign vessel, purchased by an Australian entity, changing flag to Australia, may use its (foreign) international tonnage certificate as part of the (Australian) registration process. Once registered, an Australian operator not intending to take the vessel overseas (e.g., a DCV) may make a statutory declaration to that effect and therefore does not need to maintain an Australian '69 International Tonnage Certificate.

If an Australian operator of a vessel having recently undergone a change of flag fails to request an RO to re-issue the '69 Tonnage certificate under 'Australia' within the three (3) month window specified in Convention Article 10(3) following the change of flag, and subsequently wishes to take the vessel overseas, it will require to undergo re-measurement. Holding a '69 International Tonnage certificate does not make the vessel a RAV, so going through the formality of holding on to the certificate would be a sensible solution. For DCVs, ROs can issue them on AMSA's behalf under the Navigation Act 2012 and MO 31 has been modified to allow ROs to issue them.

### **Anti-Fouling**

KP – Anti-fouling certificates are not subject to the Navigation Act 2012, but come under the Protection of the Sea (Harmful Anti-fouling Systems) Act 2006, implemented through Marine Order 98. On request, ROs are able to issue IAFS certification to vessels >400 GT. An owner of a vessel that is over 24 metres and less than 400 GT can go on to the AMSA website and download their own form (the declaration on anti-fouling).

ASA – Bio-security will be coming into effect July 2016. AMSA have no visibility as this comes under the jurisdiction of the Department of Agriculture. Once AMSA know, AMSA will let the ROs know. AMSA has no visibility on how they are going to approve water treatment systems or who will be issuing the certificates. DoA asked AMSA if we could add this in to our agreement with the ROs, but since AMSA had no authority under the Navigation Act we couldn't do it. It would be sensible if they gave AMSA the power to issue the certificates. AMSA will contact DoA contact for an update.

### **Lunch time**

#### **Item 11 – Marine order compliance**

KP – The overarching piece of legislation is the Navigation Act 2012. The Navigation Act s.340 gives regulatory making power in respect of the Conventions, which are implemented as the Marine Order series 1 to 97, as applicable.

*Note: Anti-fouling Systems Convention is applied through Marine Order 98 given effect through s.26 of the Protection of the Sea (Harmful Anti-fouling Systems) Act 2006.*

When RO plan approval officers are undertaking drawing appraisal and preparing Design Appraisal Documents/ Letters, the primary reference document is the marine order (order), which implements and describes how a convention is to be applied. Some marine orders contain additional requirements to those of a convention that on occasion do not get addressed. FSC frequently sees submissions where the reference plan approval documents only indicate compliance with a convention, e.g., SOLAS. There is no cross reference to say it's been checked and that it complies with the applicable marine order.

**Action: All ROs are requested to review plan appraisal procedures for Australian vessels to ensure that when preparing documentation reference is being made to the appropriate marine order that applies in relation to the work being undertaken.**



### **Item 12 – SPS letter of acceptance and Marine Order 50**

KP – A foreign flag vessel that intends to undertake offshore work in Australian waters, particularly in relation to operations such as diving, pipe laying or subsea floor installations etc. often carry additional personnel on board which may be regarded as Special Persons. Many flag administrations don't make the Special Purpose Ship Code (SPS code) mandatory, noting that the text of the SPS code in the Preamble makes it recommendatory. In Australia under MO 50 (Special purpose ships) 2012, the SPS code is mandatory for an Australian flag vessel and a foreign flagged vessel on a voyage starting or ending at a port in Australia or an Australian Territory. For foreign flagged vessels that are not certified as a Special Purpose Ship, MO50, s.11 allows AMSA to specify that the vessel complies with the code subject to AMSA being satisfied that a vessel's equipment, training of personnel and the proposed operations meets the intent of the code. This acceptance is implemented via an SPS Letter of Acceptance, but this requires a large documented submission with regards to fire safety gap analysis, MLC compliance, qualifications of the crew, etc. AMSA's expectation is that the submission should be made principally via the RO.

KP – Asked if there is any benefit in putting guidance in the ITC on the process. ROs agreed there is

### **Action: FSC to update ITC to provide guidance for application to obtain a Special Purpose Ship Letter of Acceptance.**

DAB – Asked question re SPS ships being issued with full SOLAS certificates as well as safety equipment and radio.

KP – Answer to the question sits in the Preamble in clause 7, SPS code. Depending on which way the vessel has been designed. Clause 7 states:

*"7 For facilitating the operation of special purpose ships, this Code provides for a certificate, called a Special Purpose Ship Safety Certificate, which should be issued to every special purpose ship. Where a special purpose ship is normally engaged on international voyages as defined in SOLAS it should, in addition, also carry SOLAS safety certificates, either:*

*.1 for a passenger ship with a SOLAS Exemption Certificate; or*

*.2 for a cargo ship with a SOLAS Exemption Certificate, where necessary,*

*as the Administration deems appropriate."*

### **Item 13 – Questions & RO issues for AMSA**

PM – Asked if there were any general questions.

Question was raised re Immersion suits and water temperature (as specified in MO 25) and having to use the Bureau of Meteorology website.

KP – The recently updated MO 25 changed the application provisions from a latitude requirement (south of 35 degrees South and north of 35 degrees North) for the carriage requirements to an average monthly sea water temperature of 15 degrees Celsius, reflecting recent changes to SOLAS.

SOLAS Ch. III Reg. 7(3) identifies the carriage requirements, and makes reference to IMO MSC.1/Circ.1046 *Guidelines for assessment of Thermal Protection* explains the basis on which the primary assessment is done through clause 3 of the circular. Clause 3 refers to: [www.nodc.noaa.gov/dsdt/oisst/index.html](http://www.nodc.noaa.gov/dsdt/oisst/index.html) or appropriate local sources. In the case of local sources, the Australian Bureau of Meteorology has more specific sea temperature and data in relation to the Australian area. <http://www.bom.gov.au/oceanography/oceantemp/sst.shtml>.

Marine Order 25 Schedule 1, 3 states:

*"3 Immersion suits, anti-exposure suits and thermal protective aids  
[SOLAS, Chapter III, regulations 7.3, 22.4 and 32.3]*

For Regulations 7.3, 22.4. and 32.3 of Chapter III, a vessel **need not carry** immersion suits, anti-exposure suits or thermal protective aids if the vessel is engaged on voyages only in areas where the average monthly sea water temperature is more than 15°C.

Based on the above statement, there is a need for the Master to undertake a documented risk assessment as to whether or not immersion suits or TPA's are required and keep appropriate records within the voyage planning system.

AMSA has on request of owners been issuing formal exemptions, to vessels on delivery to Australia or having to sail overseas for the purposes of dry-docking to satisfy any potential PSC issues.

**Action: Revise ITC with reference to MSC Circ. 1046 and use of the BOM data.**

KP – International Load Line: Brought to the attention of the meeting the case of a vessel where an international Load Line certificate issued to a vessel operating in the Great Barrier reef (GBR) only included the Load Line mark (circle and line) and the fresh water mark. This type of mark would be assigned where a vessel meets the requirements of ICLL Regulation 6(6) as an 'All Seasons' Mark, where the summer load line mark is placed at either the winter or winter north Atlantic position. An operator of a vessel with such a grid pays a deadweight 'penalty' during the summer months. The GBR is in the tropical zone (ICLL Reg. 48, 3(c)), and is also illustrated in chart form in Annex II of the Convention. If the vessel is operating continuously in a defined tropical zone a vessel needs to be marked with corresponding tropical load lines per ICLL Reg. 6(2) and Reg. 6(4) tropical timber load lines as required.

**Action: AMSA FSC to review Load Line certificates and corresponding assigned grids where the vessels are known to be operating in the tropical zone.**

DAB – Raised a question regarding the use of hinged watertight doors in lieu sliding watertight doors – should it be included in the ITC?

KP – Advised to refer back to what is in the RO agreement and in the ITC. Chapter II-I, Regulation 13 of SOLAS is written on the premise that doors in watertight bulkheads are of the sliding type. There is no IMO accepted Unified Interpretation (UI) with regards to the use or substitution of hinged watertight doors referenced by SOLAS or the RO agreement. The ITC makes the provision that where the UI's are applied AMSA accepts the UI. If there is no UI in force then ROs should comply with the requirements of SOLAS.

In the absence of a UI formally adopting IACS SC156, an RO would need to approach AMSA on a case by case basis before approving and/ or replacing sliding watertight doors required by SOLAS Ch. II-1 Reg. 13. Full details and a case for the substitution for each door at each respective bulkhead location should be provided.

DAB – Raised a question regarding the positioning of the Stern navigation lights – do they have to be on the centre line?

KP – Advised that in accordance with the relevant rule 21(c), a white light placed as nearly as practicable at the stern showing an unbroken light over an arc of the horizon of 135 degrees and so fixed as to show the light 67.5 degrees from right aft on each side of the vessel. In order to show the light symmetrically, the light would need to be placed on the centreline of the vessel at the stern. There is no objection if due to the design/ nature of the operations, a stern light needs to be offset. Measures should be in place to provide additional 'shielded' down lighting to the aft quarters of the

vessel in busy waterways or traffic systems to provide a reference profile to any vessels following astern. An exemption should be requested in such situations.

**Item 14 – AOB**

PM – Thanked everyone for their participation. There being no further business, the meeting closed at 1445.

**Item 15 – Next meeting**

Agreed next meeting will be in Melbourne, October 2016.

### Attachment 1 – Summary of Action Items

| Item No. | Description  | Responsibility | Completed |
|----------|--|----------------|-----------|
| Item 5   | Plan Approval – Livestock Carriers (MO43)<br>Action: AMSA to send out livestock carrier plan approval checklist and draft procedures to ROs for comment.   | AMSA (SI&R)    |           |
| Item 6   | Approval of stability computers<br>Action: AMSA to add new section 19.4 (stability computers) to the Instructions to Class.  | AMSA (SI&R)    |           |
| Item 7   | Review of Marine Orders (52, 58 and 60)<br>Action: AMSA to circulate revised Marine Order 52 to ROs during public consultation phase.  | AMSA (SI&R)    |           |
| Item 8   | Extending dry docking intervals<br>Action: FSC to draft a letter to each of the ROs outlining the issue and where AMSA sees itself with this with the view to developing a common approach (unified interpretation) between IACS members that can be taken to IMO.             | AMSA (SI&R)    |           |
| Item 10  | Certification, RAV vs DCV<br>Action: AMSA to revise / re-issue letter 23 June 2015, Trim ref: 2010/893, include this procedure within the ITC and send out for comment.  | AMSA (SI&R)    |           |
| Item 10  | Certification, RAV vs DCV<br>Action: AMSA FSC to provide the guidance link to ROs as well as AMSA SS managers and update the ITC with regards to the sewage requirements.  | AMSA (SI&R)    |           |
| Item 11  | Marine order compliance<br>Action: All ROs are requested to review plan appraisal procedures for Australian vessels to ensure that when preparing documentation reference is being made to the appropriate marine order that applies in relation to the work being undertaken. | ROs            | Ongoing   |
| Item 12  | SPS Letter of Acceptance (MO 50)<br>Action: FSC to update ITC to provide guidance for application to obtain a Special Purpose Ship Letter of Acceptance.   | AMSA (SI&R)    |           |
| Item 13  | Questions & RO issues for AMSA<br>Action: Revise ITC with reference to MSC Circ. 1046 and use of the BOM data.   | AMSA (SI&R)    |           |
|          | Action: AMSA FSC to review Load Line certificates and corresponding assigned grids where the vessels are known to be operating in the tropical zone.   | AMSA (SI&R)    | Ongoing   |
| Item 15  | Next Meeting<br><br>Action: Advise meeting date closer to the time.  | AMSA           |           |

