

# Consultation Feedback Report

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Proposed alternatives to carrying a float-free EPIRB for vessels less than 7.5 metres in length without level flotation that are engaged in offshore or restricted offshore operations

September 2019





**Australian Government**

**Australian Maritime Safety Authority**

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# Outline

## Consultation outcome

Following public consultation, AMSA will amend the National Standard for Commercial Vessels (NSCV) to allow certain vessel owners to choose between:

- carrying a float-free emergency position-indicating radio beacon (EPIRB) or
- carrying a manually activated EPIRB and all persons on board wearing a lifejacket.

The EPIRB must be equipped to transmit a global positioning system (GPS) location.

This alternative option will be available to all domestic commercial vessels that:

- are <7.5m in length
- do not have level flotation
- operate in the offshore (B) or restricted offshore (C) operational areas.

Lifejackets must already be carried on board these vessels. Accordingly, it will not be necessary to purchase extra lifejackets – people on board may simply wear the lifejackets already on the vessel.

Vessel owners may also choose to provide personal flotation devices (PFDs) to wear.

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## Background

It will be mandatory to carry a float-free EPIRB on the following vessels from 1 January 2021:

- class 1, 2 or 3 vessels greater than or equal to 12 metres that are operating beyond 2 nautical miles seaward from land
- class 1, 2 or 3 vessels less than 12 metres that do not have level flotation and are operating in Offshore (B) or Restricted Offshore (C) waters
- class 4 vessels greater than or equal to 12 metres that are operating in C waters
- class 4 vessels less than 12 metres that are operating in C waters.

AMSA decided to require certain vessels to carry float-free EPIRBs after an extended period of public consultation from October 2017 to February 2018. The consultation feedback report for that consultation process is available on the AMSA website. A number of stakeholders provided feedback in relation to carrying float-free EPIRBs on smaller or open vessels. For example, one submitter stated:

*In my experience, regardless of length, all DCV vessels with a Cabin which are operating in Area C waters should be required to carry a float-free EPIRB. Small open runabout style vessels could be exempt due to the ease of reaching under such vessels to grab the EPIRB and due to the impracticality of carrying float-free apparatus on such vessels.*

By contrast, another submitter stated that:

*Modern float-free category 1 EPIRBs are relatively small in size, cost effective and are provided with multiple mounting options, such that nowadays it is possible to mount them on almost any vessel, and in practise it is often the smaller vessels that get into trouble the quickest, and thus it is these vessels that will potentially see the greatest benefit from carrying a category 1 EPIRB.*

In response, AMSA noted the feedback received indicating that the need to carry a float-free EPIRB on board an open-style vessel may not be as apparent as carriage on vessels that are fully closed and that mounting the float-free EPIRB in an appropriate position may be problematic.

However, AMSA considered that in light of the superior capability of a float-free EPIRB, carrying one on these kinds of vessels may improve safety outcomes, and that vessel owners should work with the manufacturer of float-free EPIRBs to determine the best place to mount the EPIRB on the vessel. For example, in a swell, rough chop or windy conditions, retrieving articles including essential safety and communications equipment from beneath an upturned boat that is floating bow high and mostly submerged is difficult and dangerous. Additionally, if the occupants are wearing a lifejacket, it may be difficult to retrieve anything from the upturned hull without first removing the lifejacket, which would not be recommended.

On balance, AMSA decided that the most appropriate regulatory outcome having regard to feedback received was to mandate carriage of float-free EPIRBs on vessels that are less than 12 metres in length without level flotation only if they are operating in B or C waters.

However, AMSA also decided to consider potential alternatives for the smallest vessels (less than 7.5 metres in length), recognising that it may not be feasible or practical to carry a float-free EPIRB.

We therefore carried out a public consultation on four alternatives:

- Option 1: carry a float-free EPIRB (no alternative)
- Option 2: wear a personal locator beacon (PLB), in addition to carrying a manually activating EPIRB
- Option 3: carry a manually activating EPIRB and wear a lifejacket
- Option 4: carry a manually activating EPIRB in a buoyant storage device

Options 2 and 4 were developed from feedback to the previous consultation process.

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## How we carried out this consultation process

The consultation process opened on 12 December 2018 and closed on 28 February 2019.

AMSA published a consultation paper setting out the four alternatives on our website, with accompanying explanatory web content. The consultation paper invited feedback on each of the options above, and in particular asked:

- whether you think the options are practical to implement
- whether you would use any of the options, or another option, for smaller vessels you operate
- whether the options are safe
- whether you do not support any of the options
- any other reasonable alternative options we have not included.

A news item was also posted on the website, and information was included in the regular 'AMSA Update' newsletter which is emailed to those who sign up for a free subscription. The consultation paper was provided by email directly to the Domestic Commercial Vessels Industry Advisory Committee (DCVIAC), the Fishing Industry Advisory Committee (FIAC), and the Maritime Agencies Forum (MAF). We also sought feedback via a post on Facebook which set out each of the four alternatives, linking to the consultation webpage. AMSA Liaison Officers assisted with raising awareness of the consultation process through their regular stakeholder engagement activities.

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## Results of consultation

AMSA received a total of **212 submissions** and comments during the consultation period.

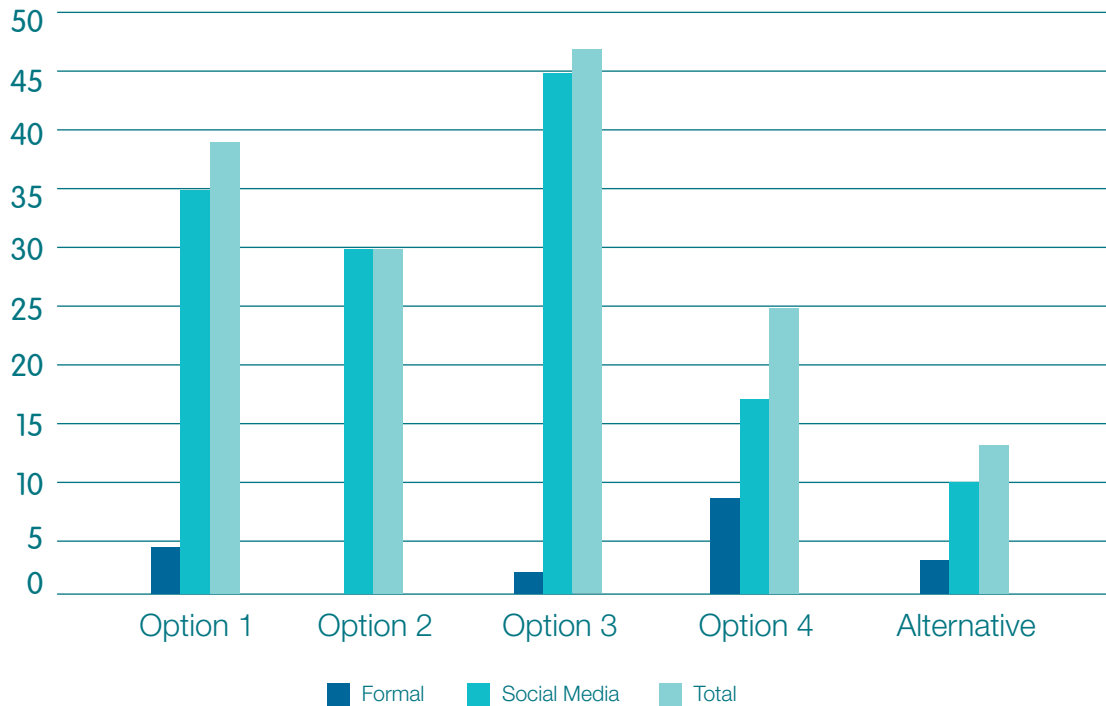
Thirteen people made formal submissions, and 186 people commented on the Facebook post. Some people made more than one comment or submission, or supported more than one option.

Seventy-three people who commented on the Facebook post did not identify a particular option or

suggest an alternative. Figure 1 illustrates support for each option.

Submissions or comments that did not support a particular option or make an alternative proposal are not represented in the graph. We only counted an original comment on Facebook, but did not count replies to comments on Facebook as they were generally not aimed at identifying an alternative option and often off topic.

## Support for options (number of submissions or comments)



**Figure 1:** Number of formal submissions and social media comments supporting each option.

### Option 1

Option 1 gained the second most support (39 submissions), with comments reflecting a high level of concern for safety as a priority over cost, the benefits of automatic activation and the simplicity of having one rule for everyone. It was identified by some as being more practical than wearing a lifejacket. In contrast, several submissions strongly opposed Option 1, for example:

- “Options 1 and 2 are stupid”
- “Only workable option is 4... the rest is a joke”
- “I write to advise against requiring float-free EPIRBs on small vessels”

There were several comments on aspects of float-free EPIRB deployment, including that float-free EPIRBs:

- may not deploy as a smaller vessel with basic flotation would not sink to the depth whether it would be submerged sufficiently to deploy
- may deploy accidentally due to waves or sea spray. One person commented from personal experience.

### Option 2

Option 2 was supported by 30 submissions. Notably,

many people who supported this option said that they were already using a PLB, with some identifying that it was best attached to their lifejacket. Similarly to those who supported Option 1, people who supported Option 2 commented along the lines that the additional means of communication in a distress situation was worth the expense. All the submissions in support of Option 2 are in Table 2 of Annex 1.

### Option 3

Option 3 gained the most support (47 submissions). Most who supported Option 3 did not explain why. Those that provided a reason generally commented on the difficulties of mounting a float-free EPIRB on a small vessel, and the risk that a float-free EPIRB would not activate as intended. All the submissions in support of Option 3 are in Table 3 of Annex 1.

Several submissions commented on the perceived impracticality of wearing a lifejacket while performing fishing operations, noting the risk of the lifejacket becoming entangled in gear, being damaged by fishing equipment (for example hooks and traps), being punctured by fish spines or simply being uncomfortable. For these reasons they did not support Options 2 and 3 which also involved wearing a lifejacket.

## Option 4

Option 4 gained the least support (25 submissions or comments). Several submitters who supported this alternative commented that it offered the additional advantage of being able to also store other safety and survival equipment in the buoyant container. One person noted that EPIRBs are themselves buoyant so the buoyant storage container was unnecessary. Several supporters of the Option 4 were already keeping their EPIRB and other safety equipment in a buoyant storage container. Some submissions specifically mentioned the purpose-built Lifecell™, but one person noted they just used a 20 litre floating drum. All the submissions in support of Option 4 are in Table 4 of Annex 1.

A number of submissions supported several options, or 'all of the above' with some commenting that it should be up to the captain or an individual to decide which option to use. We note that this would be the intention if we agree to any options.

Thirteen alternative proposals or variations on the original four options were put forward:

- Several submissions supporting options as additional, rather than alternative to a float-free EPIRB. Others supported a combination of options, for example a buoyant storage device plus wearing a lifejacket.
- An industry group proposed arrangements that may be suitable in limited circumstances where vessels are operating close (within 200m) to shore, where there would be an observer on shore, and the boat occupant would be wearing a lifejacket. If operating in darkness, lifejacket lights or a strobe fitted to the vessel would be required.
- Several submissions commented that it was better to install level flotation.
- One person proposed that float-free EPIRBs should be required, but only where the vessel was operating more than two nautical miles from shore.
- One person considered that a manually activated EPIRB would be sufficient, but that a buoyant storage device was not necessary as EPIRBs are themselves buoyant.

The 73 Facebook posts that did not identify an option or an alternative proposal generally covered the following topics:

- The government should let people make their own decisions about safety equipment. This was quite colourfully expressed at times.

- Some expressed the view that if people did not want to carry safety equipment they should be left to bear the consequences. As the central coordination agency for search and rescue in Australia, AMSA does not share this view.
- Some asked questions about how float-free EPIRBs work.
- Some expressed the view that Facebook is not an acceptable forum for consultation. Given the very low numbers of formal submissions compared to Facebook comments, we do not think that this view is widely shared.
- Comments apparently from recreational boaters, 4 wheel drivers and bushwalkers, who also have an interest in beacons in general.

All submissions are presented in full in the tables in Annex 1, along with AMSA's response to each submission.

## Key changes to proposal following consultation

Following consultation, we decided to implement Option 3, with the additional requirement that the manual EPIRB be equipped to transmit a global positioning system (GPS) location. As the central coordinating agency for search and rescue in Australia, AMSA knows the benefit of having an accurate location for a distress signal to ensure the quickest possible rescue.

AMSA notes that 72% of manually activated EPIRBs currently purchased are equipped with GPS and these numbers are rising every year. This indicates that many purchasers are also recognising the additional safety benefit of GPS. The high level of support for PLBs, which are all GPS-equipped, also indicates that the benefits of a distress beacon that can indicate location are well appreciated.

While a GPS-equipped manually activated EPIRB is more expensive than a non-GPS model, it is still cheaper than a float-free EPIRB.

## Why we are not pursuing other options

### Option 1

In making the 2018 decision to mandate float-free EPIRBs for certain vessels, AMSA committed to exploring options for vessels less than 7.5 metres in length without level flotation. While we agree

that float-free EPIRBs offer a level of safety through automatic activation that cannot be met by other options, we are aware of the practical difficulties for owners of the smallest vessels in finding somewhere to mount a float-free EPIRB, and the concerns that a small boat with basic flotation will not become sufficiently submerged to trigger the float-free mechanism.

## Option 2

The current Australian Standard for lifejackets does not include specifications for a means for attaching a PLB, and it has not yet been proven that a PLB will transmit effectively once mounted on a lifejacket. We consider that until these issues are resolved, we cannot be satisfied that allowing this option would not jeopardise safety.

## Option 4

While the advantage of having all emergency equipment in one place is noted, there is emerging evidence that the battery life of EPIRBs can be reduced when they are kept in a sealed container. The temperature in the container can rise causing the

EPIRB to self-discharge, a safety mechanism which results in using battery power. It was also noted that EPIRBs are buoyant, so a buoyant container does not confer a significant advantage. Given the limited benefits and possible drawbacks of storing an EPIRB in a buoyant storage container, we do not consider Option 4 an appropriate alternative to carrying a float-free EPIRB.

## More information

AMSA has published information on float-free EPIRBs on our website, including FAQs and a video: <https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs>

We will shortly be publishing guidance to assist owners and operators of domestic commercial vessels with their EPIRB carriage requirements.

For further information please contact [standards.secretariat@amsa.gov.au](mailto:standards.secretariat@amsa.gov.au)

AMSA has published a list of EPIRB manufacturers on the AMSA website: <http://beacons.amsa.gov.au/about/beacon-types.asp>



# Annex 1

## Summary of submissions and AMSA responses

All submissions, including formal submissions and comments received through Facebook are set out below. Tables 1, 2, 3, and 4 contain the submissions on each of the options proposed by AMSA. They are grouped this way to assist in understanding the reasons that people support them. Table 5 contains the submissions that proposed alternatives to the options proposed by AMSA. Some submissions appear in more than one table where an individual supported several options.

Table 6 contains the submissions that did not comment directly on the options proposed, and did not propose any alternatives.

### Table 1 - Submissions in support of Option 1

This table presents submissions supporting Option 1. We are not pursuing Option 1 for the following reasons.

In making the 2018 decision to mandate float-free EPIRBs for certain vessels, AMSA committed to exploring options for vessels less than 7.5 metres in length without level flotation. While we agree that float-free EPIRBs offer a level of safety through automatic activation that cannot be met by other options, we are aware of the practical difficulties for owners of the smallest vessels in finding somewhere to mount a float-free EPIRB, and the concerns that a small boat with basic flotation will not become sufficiently submerged to trigger the float-free mechanism.

	Submission	AMSA Response
1	1: carry a float-free EPIRB (no alternative)	Thank you for your submission.
2	Float-free on everything that's registered. Move with technology, only thing that matters at the end of the day is getting your loved ones home safely.	Thank you for your submission.
3	Number one I'm not wearing a life jacket while fishing	Thank you for your submission.
4	1	Thank you for your submission.
5	Option 1. No great impost and presently my EPIRB sits in the glove box!	Thank you for your submission.
6	If you go outside /offshore it should be mandatory to have EPIRB	Thank you for your submission.
7	Please proceed with options 1, 2 or 4. Fishing is a recreational sport, people should be able to undertake this in comfort and not wear a restrictive life jacket. It's UN-Australia to wear a life jacket and compliance will be a ongoing endless task Come on Aussie , come on!!	<p>Thank you for your submission. We take it as a submission in support of Options 1 and 4, noting that both Options 2 and 3 require the wearing of lifejackets.</p> <p>The requirement to carry a float-free EPIRB from 1 January 2021 applies to certain domestic commercial vessels. If you are exclusively a recreational fisher, this requirement will not affect you and you should contact your state or territory maritime safety agency for information on recreational boating safety requirements.</p>

	Submission	AMSA Response
8	<p>What actually is a domestic commercial vessel. It's a bit hard to make decisions without knowing what the reference actually is towards.</p> <p>My view is that anyone who goes to sea in anything bigger than a dingy should have a life jacket, at the very least a manually activated EPIRB, and if going offshore then should also have a automatically activated EPIRB for the vessel and as well a PLB for each crew member.</p>	<p>Thank you for your submission. A domestic commercial vessel is a vessel that is for use in connection with a commercial, government or research activity. Domestic commercial vessels are regulated by AMSA. State and territory governments regulate recreational vessels.</p> <p>We have taken your submission as supporting Option 1, since you said that if going offshore then should also have an automatically activated EPIRB. This requirement will be mandatory for designated domestic commercial vessels from 1 January 2021.</p> <p>We have also taken your submission as supporting option 2 as you suggest 'a PLB for each crew member'.</p>
9	Safety first I've always had one	Thank you for your submission.
10	Float-free would be awesome, but people like to stuff like that.	Thank you for your submission.
11	<p>My belief is all domestic commercial vessels regardless of work area should all be the same requirements.</p> <p>They are commercial. !!!</p>	Thank you for your submission.
12	Option 3	Thank you for your submission.
13	All water craft should have one. They're quite affordable these days and invaluable should a solo operator be incapacitated for whatever reason.	Thank you for your submission.
14	All water craft should have one. They're quite affordable these days and invaluable should a solo operator be incapacitated for whatever reason.	Thank you for your submission.
15	Option 1 maybe a good idea but if the vessel turns over and sinks how does the float-free surface? Option 3 or change Option 2 to include the beacon on the PFD.	<p>Thank you for your submission.</p> <p>Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information is available on the AMSA website at: <a href="https://beacons.amsa.gov.au/index.asp">https://beacons.amsa.gov.au/index.asp</a></p>

	Submission	AMSA Response
16	If operating offshore, definately. Any vessel should have float-free epirb	Thank you for your submission.
17	At least 1,2 and 3	Thank you for your submission.
18	Option 1	Thank you for your submission.
19	Just make manufactureres supply one on a new boat.	Thank you for your submission.
20	Option 1. Float-free in crash abandonment, manual distress alert if required.	Thank you for your submission.
21	What's the size of the vessel have to do with it. In a car you have to wear seat belts. You have to wear them while driving a Semi too. So size shouldn't come into the equation. They all can sink. One rule for all. Or not at all. Self activating is the safest though. But like everything. How do you know a hundred percent that it will self activate? How can you be sure a Life Vest will self inflate? You can't blow one of those up if you're knocked unconscious when thrown into the water. All just more revenue raising	Thank you for your submission.  To maximise the chance of the float-free EPIRB activating as intended, it should be mounted as per the manufacturer's instructions. More information is available on the AMSA website at: <a href="https://beacons.amsa.gov.au/index.asp">https://beacons.amsa.gov.au/index.asp</a>  AMSA does not sell EPIRBs or any other safety equipment. Registration of your EPIRB with AMSA is free.
22	Option 1 is good. As a skipper, prepare your boat for the conditions. Want to go outside in a boat that will sink (most will), then prepare well. Wearing a life jacket the whole time you're at sea would be a pain in the backside. We've done beach launches off Waddy Point on Fraser, and headed out to the Gardiner Banks with an EPIRB on board. It's remote, and a long way from emergency services. Thankfully, we'd prepared well enough we never needed assistance. A bit of common sense needs to be applied. Unfortunately, that doesn't seem to grow in everyone's garden.	Thank you for your submission.
23	Definately saves your life	Thank you for your submission.
24	1	Thank you for your submission.
25	Option 1	Thank you for your submission.
26	All boats should carry them	Thank you for your submission.
27	Number one	Thank you for your submission.
28	Things happen quick in small vessels so option 1 for Safety	Thank you for your submission.

	Submission	AMSA Response
29	None. Should all be water activated automatically. I would rather my EPIRB mounted to my dash automatically activate as if it's under water I would be in trouble anyway. Just upgraded to 2 fully water activated life jackets to be worn at all times on my boat so even if I'm unconscious I'll be saved. I think we should go automatically and not manually that way we can assist others of the boat knowing help is already on the way.	Thank you for your submission.
30	1	Thank you for your submission.
31	Option 1	Thank you for your submission.
32	All vessels should be carrying them	Thank you for your submission.
33		
36	Option 1 if any, and you can trade your old unit in as I just bought 1 that will last 8 years! Or just make in for new boats made 2019 onwards	Thank you for your submission.
37	Everything should have a Float-free EPIRB What price do you put on a Life and Safety	Thank you for your submission.  A float-free EPIRB will be mandatory for designated domestic commercial vessels from 1 January 2021. More information is available on the AMSA website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>
38	I'd say that 7.5m should have a float-free epirb because when these small vessels capsize, it's usually rapid, violent and the crew get separated from the vessel almost immediately. Think this is what happened at Rottnest island recently with those 4 guys.	Thank you for your submission.
39	As a surveyor and Vessel Master I think Option 1 Carry float-free EPIRB or Option 3 Carry manual EPIRB onboard and wear life jackets at all times are the best choices. My preference is for Option 1 Carry float-free EPIRB no alternative.	Thank you for your submission.

Table 2 - Submissions in support of Option 2

This table presents submissions supporting Option 2. We are not pursuing Option 2 for the following reasons.

The current Australian Standard for lifejackets does not include specifications for a means for attaching a PLB, and it has not yet been proven that a PLB will transmit effectively once mounted on a lifejacket. We consider that until these issues are resolved, we cannot be satisfied that allowing this option would not jeopardise safety.

	Submission	AMSA Response
1	<p>What actually is a domestic commercial vessel. It's a bit hard to make decisions without knowing what the reference actually is towards.</p> <p>My view is that anyone who goes to sea in anything bigger than a dingy should have a life jacket, at the very least a manually activated EPIRB, and if going offshore than should also have a automatically activated EPIRB for the vessel and as well a PLB for each crew member.</p>	<p>Thank you for your submission.</p> <p>A domestic commercial vessel is a vessel that is for use in connection with a commercial, government or research activity. Domestic commercial vessels are regulated by AMSA. State and territory governments regulate recreational vessels.</p> <p>We have taken your submission as supporting Option 1, since you said that if going offshore then should also have an automatically activated EPIRB. This will be mandatory for many vessels by 1 January 2021.</p> <p>We have also taken your submission as supporting Option 2 as you mention 'a PLB for each crew member'.</p>
2	At least 1,2,and 3	Thank you for your submission.
3	Should have the choice of plb or epirb	Thank you for your submission.
4	2 and 3 been thinking of doing it for a little while	Thank you for your submission.
5	Option 2 seems like a pretty common sense alternative if a float-free isn't practical.	Thank you for your submission.
6	Option 2 is better for SAR purposes.	Thank you for your submission.
7	I like to use a PLB attached to the life jacket as well as a wamblee.	Thank you for your submission.
8	Option 2	Thank you for your submission.
9	2	Thank you for your submission.
10	PFD + PLB	Thank you for your submission.
11	Option 1 maybe a good idea but if the vessel turns over and sinks how does the float-free surface. Option 3 or change Option 2 to include the beacon on the PFD.	Thank you for your submission.
12	Either of the four leave it optional	<p>Thank you for your submission.</p> <p>We have taken your submission as supporting Options 2, 3 and 4. Option 1 does not allow for a choice –you must carry a float-free EPIRB on your vessel if operating offshore without level flotation.</p>

	Submission	AMSA Response
13	2	Thank you for your submission.
14	I am a PWC operator my PLB is mounted on the left shoulder of my PFD. I have a registered PLB because I want to be safe, I travel in the outback and carry my PLB and my satellite phone. I am trying to be a responsible person. And I know first aid.	Thank you for your submission.
15	2	Thank you for your submission.
16	If you're going to have a PLB it should be fitted into a life jacket and these days should definitely include AIS	Thank you for your submission.
17	All of the above	Thank you for your submission.  We have taken your submission as supporting Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation.
18	Definitely Option 2	Thank you for your submission.
19	Option 2	Thank you for your submission.
20	2	Thank you for your submission.
21	Option #2 sounds about right to me in case you and your vessel become seperated .and if you can reach the one on the vessel you have one on your person as back up	Thank you for your submission.
22	Option 2	Thank you for your submission.
23	I wear a pdf with a PLB on my Kayak and if I had a Boat I would also have the the other Floating Epirb	Thank you for your submission.
24	2	Thank you for your submission.

	Submission	AMSA Response
25	None combine option 2 with a life jacket	Thank you for your submission.  We have taken your submission as supporting Option 2, as the consultation paper explains that Option 2 does include the wearing of a lifejacket.
26	Option 2 with an inflatable lifejacket is what I do now.. regardless depending on satellites positioning, could still be up to 4 hours floating around waiting to be rescued.. before amsa starts changing the rules and legislating accordingly, should have the technology supporting these ideas up and running first.	Thank you for your submission.
27	I have a personal emergency beacon i wear on my life jacket they are about \$300 i have talked friends into buying them for bush walking etc. also i have an Epirb. These are about \$600 roughly they have a 10 year life span so that works out at \$90. Per year one day of enjoyment. At least they give you a line of communication that does not have black spots.	Thank you for your submission. We have taken your submission as supporting Option 2.
28	Here's a tip. Give anyone you value a PLB. If they don't come home and you call the police, they wait 24 hrs to start a search. If your loved one hits the switch on a PLB everybody comes running immediately. No expense spared. Think about it!	Thank you for your submission. We have taken your submission as supporting Option 2.
29	Either option, and leave it up to the captain to decide. Soon govt regulations would like us to have arm floaties before we can step on a beach. Sorry but it's getting a bit ridiculous.	Thank you for your submission. We have taken your submission as supporting Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation from 1 January 2021.
30	Option 2	Thank you for your submission.

Table 3 - Submissions in support of Option 3

This table presents submissions in support of Option 3. We have decided to implement Option 3, with the additional requirement that the manual EPIRB be equipped to transmit a global positioning system (GPS) location. As the central coordinating agency for search and rescue in Australia, AMSA knows the benefit of having an accurate location for a distress signal to ensure the quickest possible rescue.

AMSA notes that 72% of manually activated EPIRBs currently purchased are equipped with GPS and these numbers are rising every year. This indicates that many purchasers are also recognising the additional safety benefit of GPS. The high level of support for PLBs, which are all GPS-equipped, also indicates that the benefits of a distress beacon that can indicate location are well appreciated.

While a GPS-equipped manually activated EPIRB is more expensive than a non-GPS model, it is still cheaper than a float-free EPIRB.

	Submission	AMSA Response
1	At least 1,2 and 3	Thank you for your submission.
2	2 and 3 been thinking of doing it for a little while	Thank you for your submission.
3	Either of the four leave it optional.	Thank you for your submission.  We have taken your submission as supporting Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation from 1 January 2021.
4	All of the above	Thank you for your submission.  We have taken your submission as supporting Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation.
5	Either option, and leave it up to the capitain to decide. Soon govt regulations would like us to have arm floaties before we can step on a beach. Sorry but it's getting a bit ridiculous.	Thank you for your submission.  We have taken your submission as supporting Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation.  If we provide an alternative option to carrying a float-free EPIRB, it will be up to an individual vessel operator to decide whether to carry a float-free EPIRB or to opt for the alternative/s.
6	Option 3	Thank you for your submission.
7	Option 1 maybe a good idea but if the vessel turns over and sinks how does the float-free surface. Option 3 or change Option 2 to include the beacon on the PFD.	Thank you for your submission.  Float-free EPIRBs should be mounted as per the manufacturer's instructions. They should also be mounted in a place that minimises the chance of it being trapped in a sinking vessel. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>



	Submission	AMSA Response
8	Option 3 would be appropriate for a kayak operating off shore as they could flip the kayak but still be able to get themselves back on without needing to call anyone. And automatic unit would raise an alarm as soon as it got wet.	Thank you for your submission.
9	Option 3	Thank you for your submission.
10	3	Thank you for your submission.
11	it should depend on the boat and passengers so i feel the captain knows what would best suit with me i have number 3 on a self inflatable life jacket and 4 with my flairs and other safety gear in . i take my 3 year old out with me and thought all my gear in one floatable container was a good idea and option 3 if i can't get to it	Thank you for your submission.
12	3	Thank you for your submission.
13	Option 3 is already mandated in Tasmanian Abalone Fishery, once again AMSA trying to play catch-up. Different states, different boats, different uses. A boat in Tas most probably isnt the same as 1 in Qld	Thank you for your submission.
14	Option 3	Thank you for your submission.
15	Option 3 is reasonable and easy enough to comply with. More than that it's over complicating the issue. Keep it simple stupid.	Thank you for your submission.
16	I found the AMSA website difficult to navigate for this question. A simple survey link would produce the best result, for example, Survey Monkey. The third option because it provides clear requirements, reasonable safety factor, but still leaves the responsibility on the individual instead of using nanny state strategies.	Thank you for your submission, and for your feedback on the website.  We have taken your comment as supporting option 3.
17	Option 3 is pretty close to what should be happening on all under 7.5m	Thank you for your submission.
18	Option 3	Thank you for your submission.
19	Option 3	Thank you for your submission.
20	Option 3. Anybody in any craft operating offshore should have as much safety gear as possible. Just as a side issue: In WA it should be compulsory to wear a PFD at all times as well when on the water.	Thank you for your submission.

	Submission	AMSA Response
21	Option 3	Thank you for your submission.
22	Option 3...keep it simple	Thank you for your submission.
23	Option 3	Thank you for your submission.
24	Lock in 3 Eddie	Thank you for your submission.
25	Option 3	Thank you for your submission.
26	Option 3 should be mandatory for all vessels Regardless of size.	Thank you for your submission.
27	Yes if you operate in open waters you should carry a eperb and pfb	Thank you for your submission.
28	Option 3	Thank you for your submission.
29	3 and 4	Thank you for your submission.
30	Option 3	Thank you for your submission.
31	3	Thank you for your submission.
32	3	Thank you for your submission.
33	Option 3 is what I do	Thank you for your submission.
34	Option 3	Thank you for your submission.
35	4 3	Thank you for your submission.
36	Option 3 - float-free epirbs run the risk of more false activations in a smaller craft (waste of time mounting them in protected space), plus they are double the size and cost.	Thank you for your submission.  Float-free EPIRBs should be mounted as per the manufacturer's instructions. They should also be mounted in a place that minimises the chance of it being trapped in a sinking vessel. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https:// www.amsa.gov.au/safety-navigation/distress- beacons/mandatory-float-free-epirbs</a>
37	Option 3	
38	I'd say 3rd option and in Tasmania marine and safety make you carry flares on top of the Epirb. Can someone explain why is there a need to carry both.	Thank you for your submission.

	Submission	AMSA Response
39	Hi, It is amazing that AMSA can come up with these proposals .Obviously no one there has any practical knowledge of working a small fishing vessel offshore . Option 1 and 2 are stupid If u must have this stupidity then Option 3 or 4 are the only thing that would work. Trying to install a float-free device on open fishing boats is totally impractical Hope you listen	<p>Thank you for your submission. We have taken it as supporting Options 3 and 4.</p> <p>We note that some of the options proposed in the paper were originally received as suggestions from industry during the previous consultation process on proposed new requirements around carriage of float-free EPIRBs.</p> <p>The consultation feedback report for that consultation process is available at <a href="https://www.amsa.gov.au/news-community/consultations/closed-consultations">https://www.amsa.gov.au/news-community/consultations/closed-consultations</a></p>
40	As the owner of a domestic commercial fishing vessel under 7.5m in Tas. I carry a manually operated EPIRB and wear a life jacket when underway. I do not believe anything else is required, although the EPIRB in a floating container may have benefits and does not add to much to the cost of running the vessel. A self deploying EPIRB or a PLB is not practicle in a small fishing vessel for a variety of reasons. Option 3 is adequate in my opinion.	Thank you for your submission.
41	Given it's under 7.5, then I'd go with option 3.	Thank you for your submission.
42	3	Thank you for your submission.
43	3	Thank you for your submission.

Table 4 - Submissions in support of Option 4

This table presents submissions in support of Option 4. While the advantage of having all emergency equipment in one place is noted, there is emerging evidence that the battery life of EPIRBs can be reduced when they are kept in a sealed container. The temperature in the container can rise causing the EPIRB to self-discharge, a safety mechanism which results in using battery power. It was also noted that EPIRBs are buoyant, so a buoyant container does not confer a significant advantage. Given the limited benefits and possible drawbacks of storing an EPIRB in a buoyant storage container, we do not consider Option 4 an appropriate alternative to carrying a float-free EPIRB.

	Submission	AMSA Response
1	Either of the four leave it optional.	Thank you for your submission.  We have taken it as supporting Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation.
2	All of the above	Thank you for your submission.  We have taken your submission as support for Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation.
3	Either option, and leave it up to the capitain to decide. Soon govt regulations would like us to have arm floaties before we can step on a beach. Sorry but it's getting a bit ridiculous.	Thank you for your submission.  We have taken your submission as supporting Options 2, 3 and 4. Option 1 does not allow for a choice – you must carry a float-free EPIRB if operating offshore without level flotation.
4	it should depend on the boat and passengers so i feel the captain knows what would best suit with me i have number 3 on a self inflatable life jacket and 4 with my flairs and other safety gear in . i take my 3 year old out with me and thought all my gear in one floatable container was a good idea and option 3 if i can't get to it	Thank you for your submission.  We note that an EPIRB is part of a suite of safety and communications equipment that vessels are required to carry.
5	3 and 4	Thank you for your submission.
6	4 3	Thank you for your submission.
7	4	Thank you for your submission.
8	Considering that this is setting minimum level for compliance I suggest 4 (EPIRB in protective case). Reason: float-free can self deploy under dynamic pressure and then you have no EPIRB.	Thank you for your submission.  More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>
9	4	Thank you for your submission.
10	4	Thank you for your submission.

	Submission	AMSA Response
11	Should just have 2 x epirbs,one fixed to boat and one in a float case, this is what I have in my domestic commercial vessel. The float-free epirbs do not always work so not the be all end all option.	Thank you for your submission.  Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>
12	On my non commercial 5.6 m half cab I keep flares, epirb torches and v sheet in a floating 20 litre drum within easy access outside of the cabin. Dont think in a commercial boat under 7.5m, that has positive buoyancy , you need anymore than a bright orange floating box for the epirb to sit in.	Thank you for your submission.  We note that an EPIRB is part of a suite of safety and communications equipment that vessels are required to carry.  If your vessel is <7.5m and has level flotation, you will not be affected by the new requirement to carry a float-free EPIRB.
13	Option 4 it will stand up to the punishment and impacts that will be experienced on a small vessel. Many small vessels of this size are used as tenders. Drums, SCUBA gear, spear guns, large nets, small machines, you name it, not to mention spray, and large amounts of water that dump into small vessels. These items will break a normal float-free EPIRBs mounting. Small vessels need a system that takes punishment, imagine a RIB working on a beach break, item 4 will give operators the option to adjust the container to suit there various needs.	Thank you for your submission.
14	Can't log on to AMSA Survey but Option 4 is my choice.	Thank you for your submission.
15	Option 4	Thank you for your submission.
16	4	Thank you for your submission.
17	Been running option 4 for some time now	Thank you for your submission.

	Submission	AMSA Response
18	<p>I am a 4th generation professional fisherman, spending most of my life on the water. After reviewing your options, I believe that option 4 looks like the option that makes the most sense. This option would give me everything I need in one place in an emergency as well as giving buoyancy in the water if needed.</p> <p>In my occupation wearing a life jacket can be impractical and dangerous. I am constantly holding fish under my arms, fish spikes and even fish hooks can puncture life jackets. Life jackets get tangled in shooting nets off the back of the boat. Leaning inside fish traps as I rebait them also destroys life jackets and can be dangerous if caught.</p> <p>Float-free EPIRB is not practical for my small boats as I fear it may not release if my boat does not fully submerge and would struggle to find appropriate place to mount it.</p> <p>I have spoken to all the boys in the same business and we are all of the same opinion on choosing option 4.</p>	<p>Thank you for your submission.</p> <p>AMSA acknowledges the additional benefit of a buoyant storage device in relation to being able to carry other safety and survival equipment and potentially to provide flotation assistance for a person in the water.</p> <p>Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a></p>
19	<p>Submission 1: The only one that is workable is 4 put in water tight containers or epirb the rest is a joke and AMSA loses credibility by trying to bring in law changes like this . It makes me wonder the brains / experience behind it ,everyone knows a boat under 7/8 meters with basic / level flotation will not go deep enough for the device to separate from the vessel so why bring it up it just seems like AMSA are over staffed and sit in there offices thinking of rubbish to put forward to industry. I'd like to see AMSA take control of the rec sector and save lives instead of making ours hard</p> <p>Submission 2: Only part I agree with is sealed container</p>	<p>Thank you for your submission in support of Option 4.</p> <p>We note that the only option that includes a float-free EPIRB is Option 1. Options 2 and 3 do not require a vessel to be submerged, because the EPIRBs in this case are manually activated.</p>
20	<p>Hi, It is amazing that AMSA can come up with these proposals .Obviously no one there has any practical knowledge of working a small fishing vessel offshore . Option 1 and 2 are stupid If u must have this stupidity then Option 3 or 4 are the only thing that would work. Trying to install a float-free device on open fishing boats is totally impractical Hope you listen</p>	<p>Thank you for your submission.</p> <p>We have taken it as supporting Options 3 and 4. We note that some of the options proposed in the paper were originally received as suggestions from industry during the previous consultation process on proposed new requirements around carriage of float-free EPIRBs.</p> <p>The consultation feedback report for that consultation process is available at <a href="https://www.amsa.gov.au/news-community/consultations/closed-consultations">https://www.amsa.gov.au/news-community/consultations/closed-consultations</a></p>

	Submission	AMSA Response
21	I think option 4 is appropriate (EPIRB in a flotation case)	Thank you for your submission.
22	Confidential submission in support of option 4	Thank you for your submission in support of Option 4.
23	I consider "Option 4: carry a manually activating EPIRB in a buoyant storage device" as a reasonable option. The benefit of a buoyant storage device is to have the ability to carry not only an EPIRB, but also added safety equipment ie; flares, whistle, signaling mirror, water, etc.	<p>Thank you for your submission.</p> <p>AMSA acknowledges the additional benefit of a buoyant storage device in relation to being able to carry other safety and survival equipment and potentially to provide flotation assistance for a person in the water.</p> <p>While the advantage of having all emergency equipment in one place is noted, there is emerging evidence that the battery life of EPIRBs can be reduced when they are kept in a sealed container. The temperature in the container can rise causing the EPIRB to self-discharge, a safety mechanism which results in using battery power.</p>
24	<p>As a commercial fisherman I have concerns about the proposed changes for the float-free EPIRB. As a major part of my fishing consists of pulling and baiting large fish traps if the laws are changed to compulsory lifejackets at all times this may make this job dangerous. The life jackets may interfere with safety loading the traps onto the boat and may become tangled in the ropes.</p> <p>After carefully going through the other options in my opinion option 4 looks like the most practical and safe for my operation.</p> <p>I have seen the lifecell first hand and will be investing in one for my boat regardless of the outcome of this reform. I think the majority of smaller boat owners would find option 4 the most suitable as well. Thankyou.</p>	<p>Thank you for your submission.</p> <p>AMSA is not proposing to make the wearing of lifejackets compulsory at all times – rather we are exploring alternatives to the requirement to carry a float-free EPIRB. Vessel owners could choose to take advantage of the alternative if it suited their circumstances, otherwise they can simply carry a float-free EPIRB.</p> <p>We note that an EPIRB is part of a suite of safety and communications equipment that vessels are required to carry.</p> <p>While the advantage of having all emergency equipment in one place is noted, there is emerging evidence that the battery life of EPIRBs can be reduced when they are kept in a sealed container. The temperature in the container can rise causing the EPIRB to self-discharge, a safety mechanism which results in using battery power.</p>
25	Hi, It is amazing that AMSA can come up with these proposals .Obviously no one there has any practical knowledge of working a small fishing vessel offshore. Option 1 and 2 are stupid If u must have this stupidity then Option 3 or 4 are the only thing that would work. Trying to install a float-free device on open fishing boats is totally impractical Hope you listen	<p>Thank you for your submission. We have taken it as supporting Options 3 and 4.</p> <p>We note that some of the options proposed in the paper were originally received as suggestions from industry during the previous consultation process on proposed new requirements around carriage of float-free EPIRBs.</p> <p>The consultation feedback report for that consultation process is available at <a href="https://www.amsa.gov.au/news-community/consultations/closed-consultations">https://www.amsa.gov.au/news-community/consultations/closed-consultations</a></p>

Table 5 - variations on options and other alternative proposals

This table contains the submissions that proposed alternatives to the options proposed by AMSA.

	Submission	AMSA Response
1	<p>Should just have 2 x epirbs, one fixed to boat and one in a float case, this is what I have in my domestic commercial vessel.</p> <p>The float-free epirbs do not always work so not the be all end all option.</p>	<p>Thank you for your submission.</p> <p>We note that an EPIRB is part of a suite of safety and communications equipment that vessels are required to carry. However, a float-free EPIRB will increase the chance that help is summoned quickly without requiring manual intervention.</p> <p>Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a></p>
2	<p>If the vessel is taking paid passengers and crew yes they should have them</p>	<p>Thank you for your submission.</p> <p>We note that you have proposed additional criteria for deciding which vessels should have a float-free EPIRB (the criteria proposed in the consultation paper was that the vessel is operating offshore and does not have level flotation).</p>
3	<p>Another option....call it 2a. Wear a life jacket, include a PLB fastened to the jacket and have a float-free epirb on the vessel.</p>	<p>Thank you for your submission.</p> <p>We note that you propose Option 2 as an addition, rather than an alternative to carrying a float-free EPIRB.</p> <p>The aim of this consultation process was to identify alternatives for owners who did not wish to carry a float-free EPIRB, for example where the small size of the vessel made it impractical to mount a float-free EPIRB.</p>
4	<p>Freefloat Lifecell and life jacket.</p> <p>My Lifecell has my epirb, flares, v sheet and hand-held VHF all in one grabable container that has the buoyancy to support 4 people hanging onto it.</p>	<p>Thank you for your submission.</p> <p>We note that you propose an additional requirement for a lifejacket if using Option 4.</p>
5	<p>Option 5 - Wear a life jacket, VHF Radio, AIS Class B handheld in radio or fixed installation, compulsory trip log on where applicable, Manual EPIRB.</p>	<p>Thank you for your submission.</p> <p>We do require VHF or HF radio for all vessels operating offshore, and AIS Class B for larger vessels operating offshore. By compulsory trip log on we think you are referring to requirements around vessel monitoring systems imposed by fisheries authorities.</p>



	Submission	AMSA Response
6	<p>We carry all that equipment on expeditions. For us it would be inexcusable not to.</p> <p>But I understand that people not doing expeditions like us don't carry all this because it's so expensive</p>	<p>Thank you for your submission.</p>
7	<p>I think all crew should have PLB in life jackets when in the deck in addition to float-free EPIRB on vessel. Supplied by vessel owners of course</p>	<p>Thank you for your submission.</p> <p>We note that you propose Option 2 as an addition rather than an alternative to carrying a float-free EPIRB.</p> <p>The aim of this consultation process was to identify alternatives for owners who did not wish to carry a float-free EPIRB, for example where the small size of the vessel made it impractical to mount a float-free EPIRB.</p>
8	<p>Option 3 but with float-free</p>	<p>Thank you for your submission.</p> <p>We note that you propose Option 3 as an addition rather than an alternative to carrying a float-free EPIRB.</p> <p>The aim of this consultation process was to identify alternatives for owners who did not wish to carry a float-free EPIRB, for example where the small size of the vessel made it impractical to mount a float-free EPIRB.</p>
9	<p>Portable AIS will assist in saving MOB</p>	<p>Thank you for your submission.</p>
10	<p>(5) Have a boat with level flotation</p>	<p>Thank you for your submission.</p> <p>If your vessel is &lt;7.5m and has level flotation, you will not be affected by the new requirement to carry a float-free EPIRB.</p>
11	<p>Option 1 plus plb</p>	<p>Thank you for your submission.</p> <p>We note that you propose Option 2 as an addition rather than an alternative to carrying a float-free EPIRB.</p> <p>The aim of this consultation process was to identify alternatives for owners who did not wish to carry a float-free EPIRB, for example where the small size of the vessel made it impractical to mount a float-free EPIRB.</p>

	Submission	AMSA Response
12	<p>AMSA what's the reasoning is behind not having Level and Positive Flotation &lt; 7.5 m and thinking these options are a safer alternative given they require a EPIRB and many would consider a PLB a must have given the recent events here in QLD. Will vessels without Level and Positive Flotation require to carry a Life Raft as well as these options in B and C Waters where presently the cost of a Life raft is higher in most cases than fitting a Raft and its ongoing maintenance costs.</p>	<p>Thank you for your submission.</p> <p>If your vessel is &lt;7.5m and has level flotation, you will not be affected by the new requirement to carry a float-free EPIRB.</p> <p>Carrying a life raft and having basic flotation is one of three options to meet the current standards for flotation for vessels &lt; 7.5m. Other options include:</p> <ul style="list-style-type: none"> <li>• installing level flotation; or</li> <li>• installing basic flotation and each person on board wear a lifejacket. In addition the vessel must carry enough buoyant appliances for all on board, or be fitted with grab lines secured to the side of the vessel.</li> </ul>
13	<p>What if the Epirb was hardwired into the boat or JetSki and once the motor stops running by kill switch after a few minutes device activates emergency. You would flick a switch to prepare it before entering open waters that would also track your trip.</p>	<p>Thank you for your submission.</p>

Table 6 - Submissions that did not directly address the consultation topic

	Submission	AMSA Response
1	We need less regulation one and one only payment 4 trailer rego boat rego boat licence and you should get the fishing regulations at the same time a man spends more time running around organising s*** than he does using the boat	Thank you for taking the time to respond. We are continually aiming to reduce the paperwork involved in meeting regulations.
2	When did safety become democratic?	Thank you for taking the time to respond.  When making regulations it is best practice to consult those who may be affected by the new regulations. The consultation is not a 'vote', however. AMSA will consider all responses and combine this with our knowledge and expertise to make a decision that will best promote safety.
3	How many times do you use your boat offshore , the cost is to much for many that use there boat twice a year if that , havn,t had my 5m center consol out in open water in over two years ,,paig rego for years for nothing , never used the boat	Thank you for taking the time to respond.
4	Depends on the fitment and locking mechanism of the float-free, but good idea	Thank you for taking the time to respond. We agree that a float-free EPIRB is a good idea, which is why it will be mandatory on many vessels from 1 January 2021. The current consultation aimed to identify suitable alternatives to that requirement.
5	Boats need more flotation to keep them, a lot of boats have none,Tinnies, and this does not help to give enough time for them to grab the safety gear. They have most of the equipment, it is no good If it is below deck, should be on deck were it can be reached at any stage in an emergency even if it's a roll over it should pop free and activate it is something that the maritime safety authorities need to look at and see what works in other countries and take what works and try it out to make safer boating for all.	Thank you for taking the time to respond. We agree that a float-free EPIRB is a good idea, which is why it will be mandatory on many vessels from 1 January 2021. A float-free EPIRB should be mounted according to the manufacturer's instruction and in a location that will maximise the chance that it will activate as intended.  Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>

	Submission	AMSA Response
6	As soon as a vessel has auto pilot (no one at the wheel) sail or power then yes. Otherwise it seems over kill.	Thank you for taking the time to respond. A float-free EPIRB may also be manually activated if the master or crew are able to reach it. The advantage of a float-free EPIRB is that it will self-activate when sufficiently submerged if the master or crew is unable to activate it.
7	Any other options, or is this the best that vested interests and ill-informed can come up with?	Thank you for taking the time to respond. The consultation included an invitation to propose alternative options.
8	Why not just let nature take it's course.	Thank you for taking the time to respond. AMSA's mission is "Safe and clean seas, saving lives".
9	Why people put epirbs on brackets in cabins is beyond me to many incidents happen were someone has to try and dive under up turned boat to get Epirb.	Thank you for taking the time to respond. Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>
10	All markham dominators should have one standard	Thank you for taking the time to respond. Standards for domestic commercial vessels vary according to both boat design and use.
11	Too much interference from big brother...back off	Thank you for taking the time to respond.
12	Floating free in an inverted hull on the ocean floor won't send any signals !	Thank you for taking the time to respond. Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <insert link>. float-free
13	Option 5. Box of beer	Thank you for taking the time to respond. Please place the beer in a buoyant esky so that rescuers can easily retrieve it.
14	Rules rules and more fucking rules why dont you just leave us poor seamen alone	Thank you for taking the time to respond. AMSA's mission is "Safe and clean seas, saving lives".
15	what else they wanna bring in? AMSA are just as bad are the fishos.	Thank you for taking the time to respond. AMSA's mission is "Safe and clean seas, saving lives"

	Submission	AMSA Response
16	Nothing wrong with what is already mandatory. Maybe an extra 5 to \$10 a year on your boat registration , given to vmr & rescue heicopter . Thus every boat owner is a member	Thank you for taking the time to respond.
17	Pointless exercise asking us what we would like. The decision will already have been made and you are just following the process of public consultation/ comment.	Thank you for taking the time to respond. When making regulations it is best practice to consult those who may be affected by the new regulations. AMSA will consider all responses and combine this with our knowledge and expertise to make a decision that will best promote safety. We have taken comments on this post as submissions.
18	What is the cost difference compared to a normal epirb?	Thank you for your question. EPIRBs vary in price and it is best to get a current price from a manufacturer or retailer. You can find information on approved beacon types at <a href="http://beacons.amsa.gov.au/about/beacon-types.asp#epirb2">http://beacons.amsa.gov.au/about/beacon-types.asp#epirb2</a>
19	What is the cost difference compared to a normal epirb?	Thank you for taking the time to respond.
20	What's a PLB	PLB stands for Personal Locator Beacon. You can find information on approved beacon types at <a href="http://beacons.amsa.gov.au/about/beacon-types.asp#epirb2">http://beacons.amsa.gov.au/about/beacon-types.asp#epirb2</a> .
21	Surly it's AMSA job to make the regulations. What's this public survey bullshit.	Thank you for taking the time to respond. When making regulations, it is best practice to consult those who may be affected by the regulations. We have taken comments on this post as submissions.
22	A domestic commercial vessel under 7.5m includes canoes and kayak	Thank you for taking the time to respond. It may, if the canoes and kayaks are for use in connection with a commercial, government or research activity.

	Submission	AMSA Response
23	<p>AMSA, why selective target of D.C.V, &lt; 7.5 m, include recreational vessels as a big percentage of recs need rescuing , not as much as D.C.V.</p>	<p>Thank you for taking the time to respond.</p> <p>A domestic commercial vessel is a vessel that is for use in connection with a commercial, government or research activity. Domestic commercial vessels are regulated by AMSA. State and territory governments regulate recreational vessels.</p> <p>The focus on vessels that are &lt; 7.5m in length is because these vessels may find it difficult to carry a float-free EPIRB due to space constraints, and the float-free EPIRB may not become submerged to a depth that the hydrostatic release would activate.</p>
24	<p>I write to advise against requiring float-free Epirus for small craft. I base this on personal experience in a 20metre vessel with the canister mounted in the highest position which was as protected as possible while still being able to float-free. The unit deployed itself during a knock down and the spurn was lost. It sent a false distress signal and left the vessel with no primary epiRB. The lessons n here is that the hydrostatic releases can be subjected to the required pressure for deployment from dynamic pressures and does not necessarily need to meet the hydrostatic pressure of sinking. I hope that this may be considered and float-free Epirus are not made mandatory for small craft, parties n the interests of safety.</p>	<p>Thank you for your submission.</p> <p>From 1 January 2021, &lt;7.5m vessels operating in offshore or restricted offshore waters (regardless of the distance from shore) without level flotation will be required to carry a float-free EPIRB. The purpose of the current consultation process is to explore alternatives for smaller vessels where this may be impractical.</p> <p>We note that your submission does not comment on any of the proposed options.</p>
25	<p>Why ask for opinions like every other government authority you just do what ever you wish</p>	<p>Thank you for taking the time to respond.</p> <p>When making regulations, it is best practice to consult those who may be affected by the regulations.</p>
26	<p>What do do eh? Ban all old boats? A good idea but not practical, since they make up the bulk of the recreational boating community MAST would miss out on a huge income source. Also it is not the community's responsibility to ensure vessels are safe it is the skippers job. If you take a boat out to sea that has less buoyancy or does not comply with current standards of safety then perhaps skipper should think twice before going out or face repercussions if something goes wrong.</p>	<p>Thank you for taking the time to respond.</p> <p>The current consultation does not concern recreational vessels.</p>
27	<p>Give them out to bush hikers.we already have enough safety equipment on board. If you worry about us so much how about launching our boats for us</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA's mission is "Safe and clean seas, saving lives".</p>

	Submission	AMSA Response
28	<p>why have yet more nanny state regulation! yes its advisable but it should be left to individual circumstances and choice!</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA's mission is "Safe and clean seas, saving lives".</p>
29	<p>Have you considered an "acceptable solutions chart" for all commercial vessels? Rather than the one size fits all...</p> <p>What works for one operator may not work for all especially if you consider the difference between dive, sight seeing or fishing / charter</p> <p>I'd also be pretty upset if I owned a 7.4m boat &amp; was comparing notes with someone in a 7.6m rig</p>	<p>Thank you for taking the time to respond.</p> <p>Standards for domestic commercial vessels are based on both vessel design and use. The standards also generally identify a required outcome and 'deemed to satisfy solutions'. However, if the deemed to satisfy solution does not suit your needs you may apply to have an 'equivalent means of compliance' recognised. More information is available on AMSA's website at <a href="https://www.amsa.gov.au/vessels-operators/domestic-commercial-vessels/equivalent-means-compliance">https://www.amsa.gov.au/vessels-operators/domestic-commercial-vessels/equivalent-means-compliance</a></p>
30	<p>All safety equipment should be tax free</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA is unable to change the tax laws. You may wish to make this proposal to your local member of parliament.</p>
31	<p>Can't believe asking for advice or opinion on Fb</p>	<p>Thank you for taking the time to respond.</p> <p>When making regulations, it is best practice to consult those who may be affected by the regulations. We have found that Facebook is an effective way to engage during a consultation, and complements other methods such as consultation through our website portal, and paper feedback forms.</p>
32	<p>I no longer have a boat but I carry a PLB in my 4WD when traveling, especially travelling remotely. I also visit the AMSAR website and upload trip notes so they know what they are looking for if I ever have to use it</p> <p>I also wore it when I rode my motorcycle from Brisbane to Darwin, if I had fallen off the road, they might never find me.</p>	<p>Thank you for taking the time to respond.</p> <p>Thank you for registering your beacon with us. Please remember that Beacon registration is valid for two years and renewal can be done online on the beacon registration system or by contacting 1800 406 406.</p> <p>Whenever your contact details or beacon details change, please update them online.</p> <p>Further information is available on AMSA's website at <a href="https://beacons.amsa.gov.au/registration/index.asp#rego">https://beacons.amsa.gov.au/registration/index.asp#rego</a></p>
33	<p>Less government legislation and let us live our own lives!!!!!!!</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA's mission is "Safe and clean seas, saving lives".</p>
34	<p>No more regulations and additional expense</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA's mission is "Safe and clean seas, saving lives".</p>

	Submission	AMSA Response
35	If people are dumb enough to die let them	Thank you for taking the time to respond. AMSA's mission is "Safe and clean seas, saving lives".
36	Domestic Commercial" ? Please clarify! Domestic, as in private craft used for recreation purposes. Commercial, as in craft used for work, etc, in a commercial sense	Thank you for your question.  A domestic commercial vessel is a vessel that is for use in connection with a commercial, government or research activity. Domestic commercial vessels are regulated by AMSA. State and territory governments regulate recreational vessels.
37	Make law the same for everyone don't just think commerical need it lot of recs get in trouble they don't have sms plans or procedures that we have to have and practice	Thank you for taking the time to respond. Domestic commercial vessels are regulated by AMSA. State and territory governments regulate recreational vessels.
38	All epirbs should be placed in an area which would be of ease to either float-free or grab, should not be placed in a cabin or any where that it could be obstructed from grabbing or floating free	Thank you for taking the time to respond.  Float-free EPIRBs should be mounted as per the manufacturer's instructions. More information, including on how float-free EPIRBs deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>
39	Bloody nanny state	Thank you for taking the time to respond.  AMSA's mission is "Safe and clean seas, saving lives".
40	Optiln 5 keep idiots of the water	Thank you for taking the time to respond.  Unexpected events can happen to the most experienced and competent seafarers, so a float-free EPIRB and/or other safety equipment may increase the chance of survival and rescue.
41	I am sure AMSA must be on lucrative kickbacks from the manufactures of the equipment. Take flares for instance a dangerous and redundant signalling device that now have to be in date.	Thank you for taking the time to respond.  AMSA does not receive anything from equipment manufacturers.  Flares are generally required on those that are operating beyond sheltered waters or within sheltered waters that are beyond 2nm from shore or in a remote area. You can find safety equipment lists for domestic commercial vessels on AMSA's website at <a href="https://www.amsa.gov.au/about/regulations-and-standards/national-standard-commercial-vessels-nscv">https://www.amsa.gov.au/about/regulations-and-standards/national-standard-commercial-vessels-nscv</a>  Flares which have passed their expiry date are not reliable and are susceptible to failure.



	Submission	AMSA Response
42	<p>Is this on top of the vms? If you're tracking the vessel constantly wouldn't the current epirb laws be enough?</p> <p>Are these laws just for the commercial sector or will the recreational sector need to conform too?</p>	<p>Thank you for taking the time to respond.</p> <p>A vessel monitoring system (VMS) is a requirement imposed by state and territory fisheries authorities for fisheries monitoring purposes and does immediately alert authorities to a distress situation.</p> <p>A float-free EPIRB is automatically activated when submerged to a certain depth, and sends a signal instantly.</p> <p>The current consultation only concerns domestic commercial vessels. Domestic commercial vessels are regulated by AMSA. State and territory governments regulate recreational vessels.</p>
43	<p>Yes safety first</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA's mission is "Safe and clean seas, saving lives".</p>
44	<p>AMSA why are you asking opinions from everyone. Surely should be only domestic commercial boat owners and crew. This is pointless</p>	<p>Thank you for taking the time to respond.</p> <p>When making regulations, it is best practice to consult those who may be affected by the regulations. The safety of domestic commercial vessel boat owners and crew also affects those people's friends and family, as well as rescuers if they should get in trouble. Boat and equipment designers and manufacturers are also affected by the regulations.</p>
45	<p>Float-free should be compulsory on all commercial vessels over 10m, not boats under 7.5m. It is the prawn trawlers that mysteriously go missing without an epirb activation, not the small craft under 7.5m I can think of 2 or 3 trawlers alone off Fraser in recent years as well as the FV Dianne off 1770 that all went down without a trace. I cannot think of any small commercial boats under 7.5m that just went missing.</p>	<p>Thank you for taking the time to respond.</p> <p>Float-free EPIRBs will be mandatory for many vessels from 1 January 2021. See <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a> for further information.</p> <p>The current consultation process aimed to identify suitable alternatives for smaller vessels.</p>
46	<p>Probably not the best place to canvass this subject considering most people either don't understand commercial requirements or just don't bother to read the intro.</p> <p>As a commercial operator we have already responded via your website survey.</p> <p>Maybe you need to explain a lot better or just remove from public forum.</p>	<p>Thank you for taking the time to respond, and thank you for your submission via our website.</p> <p>In the Facebook post we presented a simple description of the options that experienced seafarers were easily able to relate to their own situation. The Facebook post received more than 10 times the number of responses compared to the web site portal. The Facebook post also contained a link to the full detail of the consultation. The responses we received to the Facebook post indicated that many people had an excellent understanding of the issues. Also, this report provides the opportunity to respond and educate where submissions demonstrate a lack of understanding.</p>

	Submission	AMSA Response
47	<p>If this is made law it would be nuts. You can't expect people who have a kayak, simply to paddle around on, to be able to afford a eperb. They are expensive and you have to pay an ongoing cost, that would likely be more expensive than the craft they are in.</p> <p>Sure by all means make them law for larger boats, but for a tinny or small craft that likely won't ever access ocean or rough water it's a bit of a game changer.</p> <p>If these devices were cheap enough for most people, there wouldn't be the need to have any debate on whether they should be mandatory, or where to attach them.</p> <p>As for larger craft there are plenty of cashed up luxury boats around that should be made to have these as part of their stringent safety standards. But where do you stop if you go smaller? Will we see these made law for anyone surfing?</p> <p>The fact many can't simply afford this, and how much money you have should not be the deciding factor of you going on a small water craft.</p>	<p>Thank you for taking the time to respond.</p> <p>We recognise that for smaller craft the requirement to carry a float-free EPIRB may not be practical. The aim of the consultation was therefore to identify alternatives for smaller craft that do operate offshore without level flotation.</p> <p>You may wish to note that:</p> <ul style="list-style-type: none"> <li>• A vessel that does not operate offshore will not be required to carry a float-free EPIRB.</li> <li>• A vessel that operates offshore that has level flotation will not be required to carry a float-free EPIRB.</li> <li>• Surfboards are not 'vessels' for the purpose of the laws that AMSA administers.</li> </ul>
48	<p>Seems like your trying to reinvent the wheel amsa.</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA's mission is "Safe and clean seas, saving lives".</p>
49	<p>Got rating for level flotation Chris Disney but believe it all comes down to area of operation &amp; risk analysis. Open boat under 7.5 meters at 20 knots with plenty of water being picked up &amp; thrown around ....mmmm ....last thing you need is a premature ejaculation.</p>	<p>Thank you for taking the time to respond.</p> <p>A vessel that operates offshore that has level flotation will not be required to carry a float-free EPIRB.</p> <p>We recognise that for smaller craft the requirement to carry a float-free EPIRB may not be practical. The aim of the consultation was therefore to identify alternatives for smaller craft.</p>
50	<p>Let Darwin's Theory be demonstrated</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA's mission is "Safe and clean seas, saving lives".</p>
51	<p>Owning a boat is mostly a costly toy considering when the fish decide to bite we got to throw them back..bring out another thousand.that is what boat stands for.Ps... lack of ramps is also a problem.</p>	<p>Thank you for taking the time to respond.</p>

	Submission	AMSA Response
52	Whats with all you idiots havent we got enough regulations nor with vms we are drowning in red tape thought up by dickheads in offices who have no idea if you want that shit buy it yourself fuck off and leave the rest of us alone	Thank you for taking the time to respond. AMSA's mission is "Safe and clean seas, saving lives".
53	People need to use common sense if the weather is turning to shit put ya jacket on for just in case.	Thank you for taking the time to respond. We agree that wearing a lifejacket in rough conditions is common sense.
54	If people don't wish to wear or carry the right safety gear - fine! Just let them wear and carry the cost of the consequences.	Thank you for taking the time to respond. AMSA's mission is "Safe and clean seas, saving lives".
55	Becoming Hypothetical Sort out the the battery replacement orherwise we end up with 100,000s of non usable EPERBs to be recycled.	Thank you for taking the time to respond. We note your comment on replaceable batteries.
56	I've been boating. Sail and power for many years around the world where commonsense in this recreation prevails... What is it with Australia and its Health And Safety system... Doesn't say much for what it thinks about the population!!!!!! Or is it once again money orientated???????	Thank you for taking the time to respond. AMSA's mission is "Safe and clean seas, saving lives".
57	I don't care what one I have as long they send a single that you need help	Thank you for taking the time to respond. A float-free EPIRB is a water-activated EPIRB fitted in a float-free bracket. It can activate itself and float free to the water's surface. It activates when a vessel is submerged to a depth of 1 to 4 metres underwater. A float-free EPIRB can also be manually removed from its bracket and manually activated without it being submerged in water A float-free EPIRB will be mandatory for many vessels from 1 January 2021. The aim of this consultation was to identify suitable alternatives for smaller vessels.
58	Just ask the defence department to surrender one single purchase of a fighter jet... all vessels and individuals in australia could be equiped free of charged if we made the product in australia... wake up Australia!	Thank you for taking the time to respond. AMSA is the national regulator for domestic commercial vessels, and does not make decisions on defence spending. You may wish to discuss your views with your local member of parliament.

	Submission	AMSA Response
59	<p>Submission 1: Do not support carriage requirements on vessels excluding those that do not have level flotation. Any vessel that is designed to meet one of the flotation standards will not sink to sufficient depth to activate the hydro static release device on a float-free epirb. Exclude any vessel fitted with either basic or level flotation, achieved by instillation of a LDFM [low density flotation material].</p> <p>Submission 2: Level flotation does not render a vessel immune from capsizing. It is almost as likely that a vessel with level flotation will float upside down as upright. What is the justification for not requiring these vessels to have an FFE [Float-free EPIRB] whilst vessels with basic flotation do??</p> <p>Submission 3: A PLB has a guaranteed broadcast time of only 24h. Have you got sign off from SAR that they can respond to marine incidents in any part of B waters within this time frame?</p> <p>Submission 4: The focus of the exception/ alternatives should be targets where there is a robust engineering solution in place for vessel flotation. ie vessels fitted with low density flotation material, sufficiency to meet either the basic or level flotation criteria of a recognised. This is not simply "level flotation" though. Level flotation can be achieved without any foam materials. Furthermore it should not exclude basic flotation as float-free EPIRBs will suffer the same issues as normal ones in the event of a sinking event (you have to swim under and get them). however they are even harder to get out of the brackets and manually activate.</p> <p>Submission 5: Support. Except for attachment to a buoyant appliance. Why would you attach it to a buoyant appliance?? They are buoyant on their own and you probably want to take it with you in your hand and or tie it to yourself (with the lanyard that is required for the EPIRB).</p>	<p>Thank you for your submission. There will be a requirement for small vessels operating from 1 January 2021 if those vessels are operating in B or C waters (regardless of the distance from shore) without level flotation. The purpose of the current consultation is to explore alternatives for smaller vessels where this may be impractical.</p> <p>Depending on the configuration of the vessel and the location of the EPIRB, an EPIRB installed on a vessel with basic flotation may end up at depth at which it is impractical for a person (particularly one wearing a lifejacket) to retrieve the EPIRB. This situation considered less of a risk in relation to a vessel with level flotation.</p> <p>This is acknowledged as a limitation of PLB, compared to an EPIRB that should broadcast for at least 48 hours. We note that the time taken to respond to an incident can depend on factors other than distance (for example weather, resources).</p> <p>As noted above, there will be a requirement for small vessels operating from 1 January 2021 if those vessels are operating in B or C waters (regardless of the distance from shore) without level flotation. The purpose of the current consultation is to explore alternatives for smaller vessels where this may be impractical.</p> <p>Following our further correspondence, we take this as a proposal that for vessels &lt;7.5m a manually activated EPIRB is sufficient.</p>

	Submission	AMSA Response
60	At least they're doing proper consultation, giving option's and giving us time unlike FQ who just give us a handful of problems and no support	Thank you for taking the time to respond.  When making regulations, it is best practice to consult those who may be affected by the regulations.
61	How do these float-free EPIRB's work? All of the ones I've seen in my job are activated by a hydrostatic release, which don't operate until they are more than four metres under water. A bit difficult for a 6 mtr for example glass boat with built in flotation foam.....	Thank you for taking the time to respond.  More information, on float-free EPIRBs including on how they deploy, is available on AMSA's website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a>  We recognise that for smaller craft the requirement to carry a float-free EPIRB may not be practical. The aim of the consultation was therefore to identify alternatives for smaller craft.
62	How does a DVC under 7.5 metre get surveyed without level floatation and a EPIRB.	Thank you for taking the time to respond.  A vessel that is < 7.5m may have level or basic flotation. If it has basic flotation, then additional buoyant appliances and lifejackets are required. A manually activated EPIRB is already mandatory for all vessels operating more than 2 nautical miles from land. From 1 January 2021, many vessels will be required to have a float-free EPIRB.  We recognise that for smaller craft the requirement to carry a float-free EPIRB may not be practical. The aim of the consultation was therefore to identify alternatives for smaller craft.
63	Don't look at the \$\$\$ figure it's CHEEP life insurance incase you need it	Thank you for taking the time to respond.
64	as a charter skipper I had to have all the gears when it came to safety, but if you want people to buy this gear etc then get it subsidised and people will get it, but no some office worker will say you have to buy one just in case and people dont like being told what to do, subsidies them and people will buy, not rocket science but hey we want to keep the emergency rescue teams working so why worry	Thank you for taking the time to respond.  Subsidising float-free EPIRBs was not considered feasible. The aim of this consultation is to instead identify practical and safe alternatives to float-free EPIRBs for smaller vessels.
65	How do they justify \$200 dollars to replace battery on a 406 ..absolute flogg . & it's someone else epirb not yours.	Thank you for taking the time to respond.  Further information on beacons, including information on purchasing and maintaining beacons is available on AMSA's website at <a href="https://beacons.amsa.gov.au/index.asp">https://beacons.amsa.gov.au/index.asp</a>

	Submission	AMSA Response
66	<p>Why would a badly build 7.5 meter boat be considered better then a very well build 7.49 meter boat. These rules and regulations are getting ridiculous. Should we have a rule for a each and every different type of boat, and each one is different.. and then by the following year, while your boat did not all of a sudden become unsafer, you now dont pass these rules as someone sitting behind a desk changed them</p>	<p>Thank you for taking the time to respond.</p> <p>Standards for domestic commercial vessels vary according to both boat design and use.</p> <p>Our Statement of Regulatory Approach 2018 sets out how AMSA approaches the regulation of domestic commercial vessels and international shipping. You can read the Statement on our website at <a href="https://www.amsa.gov.au/about/corporate-publications/statement-regulatory-approach-2018">https://www.amsa.gov.au/about/corporate-publications/statement-regulatory-approach-2018</a></p>
67	<p>so now a tracker is compulsory to even use the ocean in a boat?</p>	<p>Thank you for taking the time to respond.</p> <p>EPIRBs only track when activated, so that you can be rescued.</p>
68	<p>I think you should at least inspect the vessels before they pay rego. Check the safety gear, lights, engine ect. Just like a car has too.</p>	<p>Thank you for taking the time to respond.</p> <p>Domestic commercial vessels are subject to a system of regular surveys and inspections.</p>
69	<p>Why are you asking everyone when this will only affects commercial boats.</p>	<p>Thank you for taking the time to respond.</p> <p>When making regulations, it is best practice to consult those who may be affected by the regulations. The safety of domestic commercial vessel boat owners and crew also affects those people’s friends and family, as well as rescuers if they should get in trouble. Boat and equipment designers and manufacturers are also affected by the regulations.</p>
70	<p>I don’t know the difference.I thought there were only the ones the shop sell.Seriously,they all look the same.</p>	<p>Thank you for taking the time to respond.</p> <p>More information, on float-free EPIRBs including on how they deploy, is available on AMSA’s website at <a href="https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs">https://www.amsa.gov.au/safety-navigation/distress-beacons/mandatory-float-free-epirbs</a></p> <p>Information on types of EPIRBs and other beacons is also on our website at <a href="https://beacons.amsa.gov.au/index.asp">https://beacons.amsa.gov.au/index.asp</a></p>
71	<p>no one does anything &amp; nothing can happen lets get sufers to wear helmets and floataion device and surf only in pairs at patrolled beach only all swimmers must have a certificate in swimming or no entry to water Theses things would save a lot more</p>	<p>Thank you for taking the time to respond.</p> <p>AMSA regulates domestic commercial vessels – we are not responsible for regulating surfing and swimming.</p>

	Submission	AMSA Response
72	<p>What statistics are you using to call for change, current vic requirements are substantial enough, would like to see why you are calling for change or are you just adding further expense without reason AMSA?</p>	<p>Thank you for taking the time to respond.</p> <p>The aim of this consultation process is to identify safe and practical alternatives to carrying a float-free EPIRB. The cost of the alternative option that we have identified through this process – to carry a GPS-equipped, manually activated EPIRB and wear a lifejacket – is less than the cost of a float-free EPIRB.</p>
73	<p>Even being out on my jetski i think i should carry an epirb.</p>	<p>Thank you for taking the time to respond.</p> <p>A personal watercraft that is a domestic commercial vessel must carry an EPIRB if operating greater than 2 nautical miles from land.</p>