



Australian Government

Australian Maritime Safety Authority

# Consultation Report

Marine Surveyors Accreditation Guidance  
Manual— Part 2 - Survey of vessels –  
Edition 3

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# Contents

|                                                                                        |            |
|----------------------------------------------------------------------------------------|------------|
| <b>Contents .....</b>                                                                  | <b>iii</b> |
| Background .....                                                                       | 1          |
| The Consultation Process.....                                                          | 1          |
| Consultation Feedback Overview .....                                                   | 2          |
| Responses to Consultation Questions.....                                               | 4          |
| Key Question 1 – Changes to CE certification.....                                      | 4          |
| Key Question 2 – Midcycle flexibility changes.....                                     | 7          |
| Key Question 3 – Survey Code options.....                                              | 8          |
| Key Question 4 – Increased details within the manual .....                             | 9          |
| Key Question 5 – New definition .....                                                  | 10         |
| Other Consultation Feedback.....                                                       | 13         |
| Feedback Item 1 - Changes Exemption 40 vessel surveys within Chapter 7 .....           | 13         |
| Feedback Item 2 - Changes to Marine Order 503 provisions .....                         | 14         |
| Feedback Item 3 - Changes to Table 8 and 10 yearly survey items .....                  | 14         |
| Feedback Item 4 - Reasonable period .....                                              | 15         |
| Feedback Item 5 - Changes to recommendation with dispute clause.....                   | 16         |
| Feedback Item 6 - Removal of duplicated Marine Order 503 content from SAGM 2....       | 17         |
| Feedback Item 7 - Changes to Annexes .....                                             | 19         |
| Feedback Item 8 - Additional electrical surveys .....                                  | 19         |
| Feedback Item 9 - Additional changes to the CE scheme.....                             | 19         |
| Feedback Item 10 - Shipyard capability.....                                            | 20         |
| Feedback Item 11 - Additional instructions for surveyors, forms or other content ..... | 20         |
| Feedback Item 12 - survey criteria for Temporary operations exemptions.....            | 21         |
| Feedback Item 13 – New chapter for towing surveys.....                                 | 21         |
| Feedback Item 14 – Requirements for dive surveys.....                                  | 23         |

# Consultation Report: Marine Surveyors Accreditation Guidance Manual– Part 2 - Survey of vessels – Edition 3

This report provides a summary of the feedback received from stakeholders regarding the proposed changes to the *Marine Surveyors Accreditation Guidance Manual– Part 2 - Survey of vessels* – Edition 3 (SAGM 2).

## Background

The *Marine Surveyors Accreditation Guidance Manual– Part 2 – Survey of vessels* - Edition 3, is a reissue of the *Marine Surveyors Accreditation Guidance Manual 2014 – Part 2*.

SAGM 2 sets clear standards and criteria for Accredited Marine Surveyors (AMS) and Recognised Organisations (class societies), outlining the procedures for surveying domestic commercial vessels (DCVs) to ensure compliance with safety regulations and standards.

Since its introduction on 1 July 2018, AMSA has gathered significant feedback and insights, which are proposed to be incorporated into Edition 3.

## The Consultation Process

The consultation for SAGM 2 was open for a period of eight weeks, commencing on 1 February 2024 and closing on 2 April 2024.

The draft and a summary of the proposed changes were published on our website and stakeholders were asked to submit feedback using the online submission form, via email, or by contacting AMSA Connect.

The consultation was directly promoted through:

- A news story posted on the AMSA website,
- The “AMSA Update” newsletter with a distribution of around 22,000,
- The “Survey Matters” newsletter with a distribution of around 400 and
- Targeted direct email sent to around 400 AMS recognised originations and boat builders.

Additionally, the consultation was highlighted through AMSA’s social media channels including Facebook and LinkedIn.

AMSA held a public consultation online information session covering key changes on 22 March, attended by 21 industry members. Attendees asked a range of questions during the information session, which were addressed at the time and are included in the consultation results below.

AMSA presented consultation feedback at the May 2024 surveyor workshops and discussed changes with the around 100 attendees.

AMSA also raised awareness of the consultation process through its regular stakeholder engagement activities, including through the National Safety Committee and the Regional Safety Committee forums.

## **Consultation Feedback Overview**

AMSA received a total of 9 submissions during the consultation period:

- 7 submissions received via the online submission form
- 2 submissions received via email.

The submissions included a total of 92 comments.

We have also considered 12 comments from the online information session.

As discussed in further detail below, most respondents indicated they supported the proposed SAGM amendments. Nine respondents also provided submissions, comments and recommendations for improvement to the draft order. These comments were considered during the preparation of the final order, as described below.



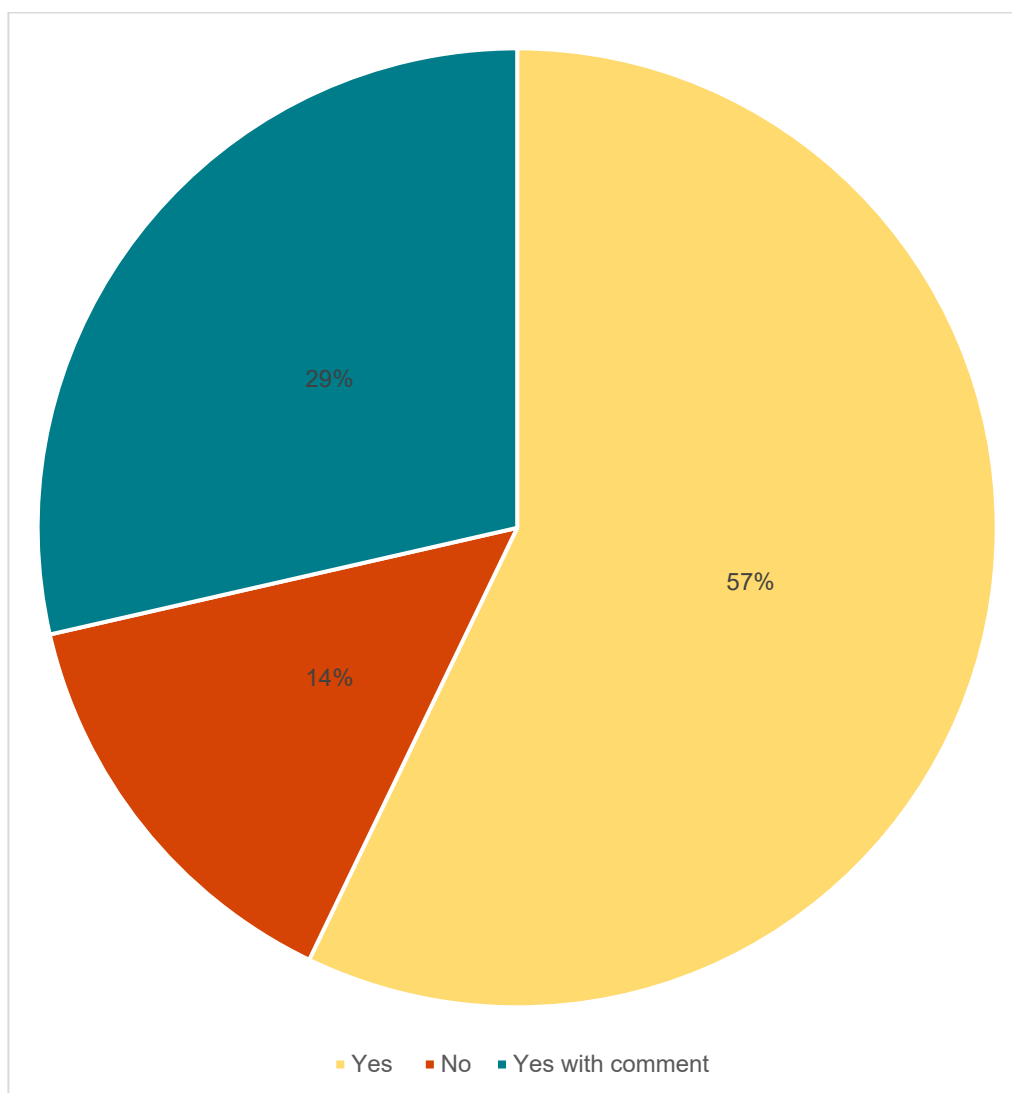
# Consultation Question Responses



## Responses to Consultation Questions

### Key Questions 1 and 2 – Changes to CE certification

**Question 1 - Do you support acceptance of simplified CE module standards for class 2 vessels used only for recreational type purposes?**



*Figure 1: Responses for Question 1 - Do you support acceptance of simplified CE module standards for class 2 vessels used only for recreational type purposes?*

*Pie chart: 57% said Yes, 29% said Yes with comment, 14% said No.*



## Question 2 - Do you support aligning CE module requirements for leisure-use Class 2 vessels with those currently required for Class 4 vessels?

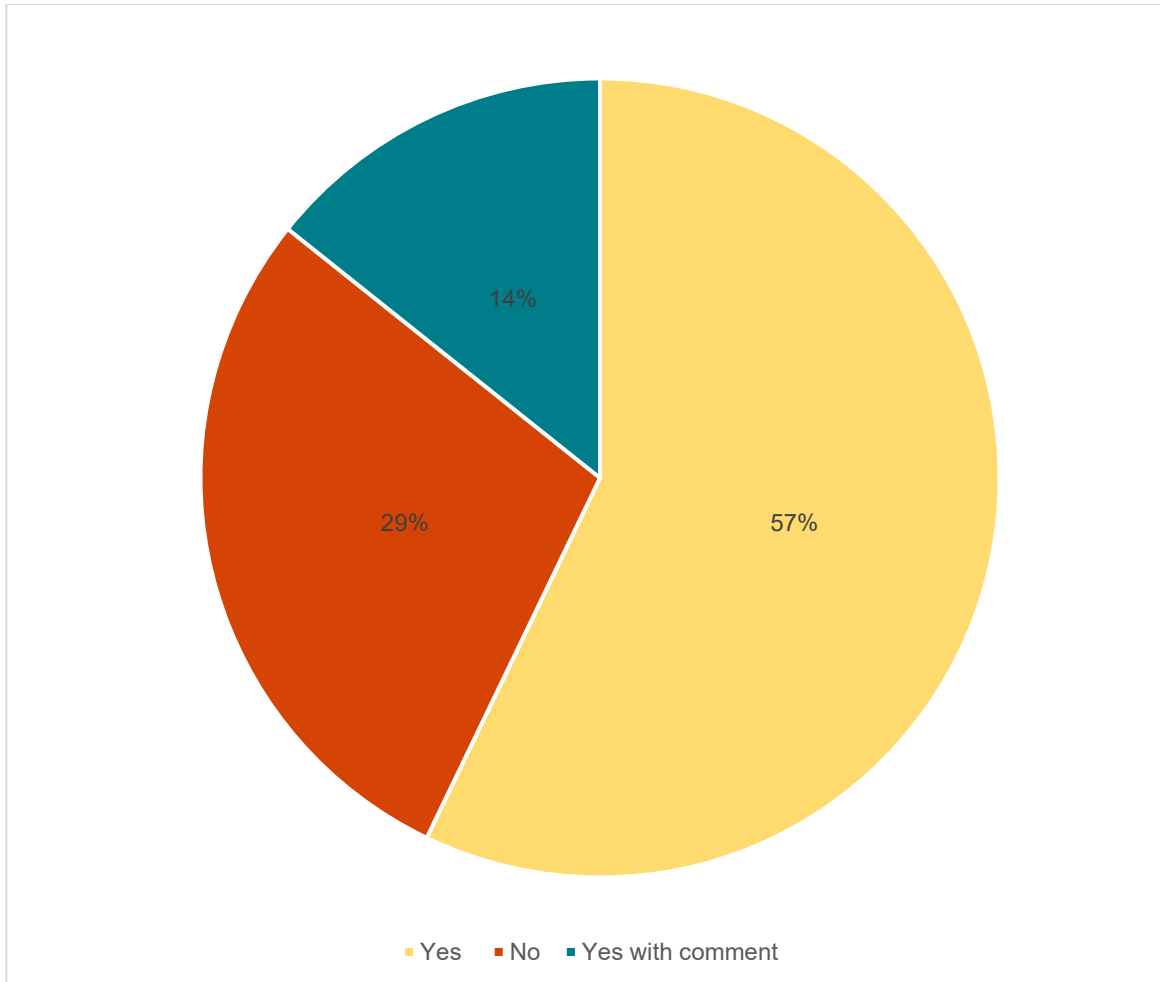


Figure 2: Responses for Question 2: Do you support aligning CE module requirements for leisure-use Class 2 vessels with those currently required for Class 4 vessels?  
Pie chart: 57% said Yes, 29% said No, 14% said Yes with comment.

The majority of industry respondents supported the proposed changes to CE certification of Class 2 vessels, or supported them with comments.

### Comment 1

One comment highlighted the draft erroneously allowed CE Module A1 in cases where it is not currently permitted for Class 4.

### AMSA response

This was a drafting error and has been corrected to align with existing Class 4 certification requirements.

## Comment 2

One submission queried why SAGM accepts CE for Class 4 vessels up to 24m but only up to 13m for Class 2.

### AMSA response

The applicable standard for Class 4 vessels, NSCV F2, permits the use of ISO certification up to 24m. However, the applicable standard for Class 2 vessels is NSCV C3 which limits application of ISO to 13m. The revision to SAGM 2 is to be made within this existing policy framework and limitations.

## Comment 3

Two submissions requested a definition of leisure use be added.

### AMSA response

Based on this suggestion, AMSA propose to include the following definition into SAGM 2.

**Leisure use of a Class 2 vessel means** undertaking activities that are typically undertaken on a Class 4 vessel, with an appropriately qualified crew onboard.

*Note 1: While Class 2 leisure use aligns with those activities permissible on a Class 4 vessel, the vessel, survey, operational and safety standards that must be met are those for a Class 2 vessels.*

*Note 2: Operations that are not wholly leisure type activities include: carriage of cargo; the ferrying / taxiing of passengers or special personnel; sightseeing tours; recreational dive charter or commercial diving; waterways patrol; search and rescue; towing; or other kinds of operations commonly undertaken by workboats.*

## Comment 4

One submission raised concerns regarding the potential for fraudulent ISO paperwork or substandard construction outcomes with the ISO certification scheme.

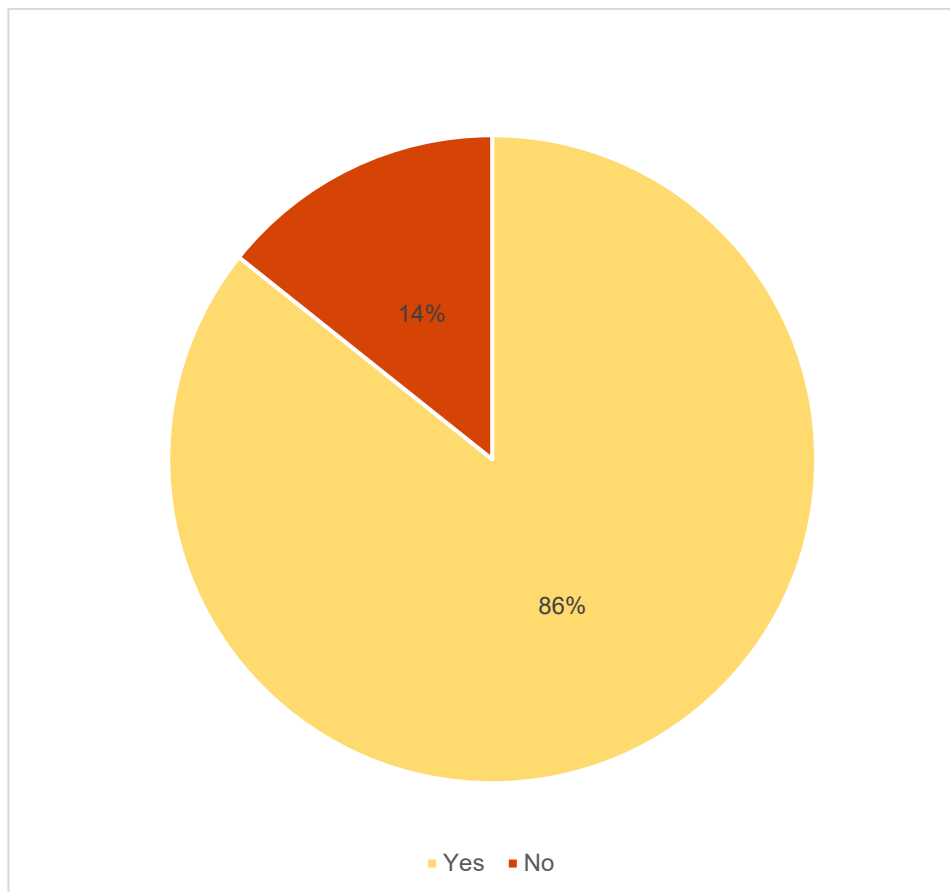
### AMSA response

AMSA acknowledges these concerns, but it is noted that the same ISO certification scheme has been permitted for Class 4 vessels in identical operational areas for an extensive period now. The scheme is simply being extended to structural certification for Class 2 vessels with the same use.



## Key Question 3 – Midcycle flexibility changes

**Question 3 - Do you support the proposed adjustments to allow more flexibility in mid-cycle periodic surveys for vessels with high or medium survey frequencies?**



*Figure 3: Responses for Question 3 – Do you support the proposed adjustments to allow more flexibility in mid-cycle periodic surveys for vessels with high or medium survey frequencies?  
Pie chart: 86% said Yes, 14% said No.*

The majority of industry supported the proposed changes.

### Comment 1

One submission opposed to the changes to medium frequency on the basis that machinery cannot be run with the vessel out of water and noted that failure of machinery and vessel systems is prominent within AMSA incident data.

### AMSA response

AMSA acknowledges that operation and testing of machinery is an integral aspect of ensuring the safety and reliability of vessels. The importance of thorough maintenance and testing, especially considering statistics indicating machinery and vessel systems failure, is duly noted. However, AMSA also wishes to highlight the various benefits offered when surveys are conducted out of water.

Conducting surveys out of water allows for a comprehensive examination of a vessel's hull, propellers, seals, bearings and other components that are submerged and not easily accessible or visible when the vessel is in water. This thorough inspection can identify issues such as corrosion, damage to the hull, and the condition of the propeller blades, which are paramount to the vessel's safety but would be overlooked if the survey is conducted in water.

AMSA highlights that SAGM 2 does not specify criteria for operating machinery during in-water surveys. Instead, responsibility for maintenance lies with the vessel owners, who must adhere to the maintenance plans as required by Section 10 of [Marine Order 504 – Certificates of operation and operation](#).

AMSA maintains the view that allowing owners flexibility to conduct a year-3 survey either in or out of water is effective within the existing survey and operational safety framework.

## Key Question 4 – Survey Code options

**Question 4 – Do you prefer that AMSA creates survey codes for both options, with the accredited surveyor marking the unused code as 'not required', or should AMSA only issue codes for option A, requiring the owner or surveyor to request new codes as needed?**



Figure 4: Responses for question 4 - Do you prefer that AMSA creates survey codes for both options, with the accredited surveyor marking the unused code as 'not required', or should AMSA only issue codes for option A, requiring the owner or surveyor to request new codes as needed?

Pie chart: 100% said Codes for both options, 0% said Only option A.

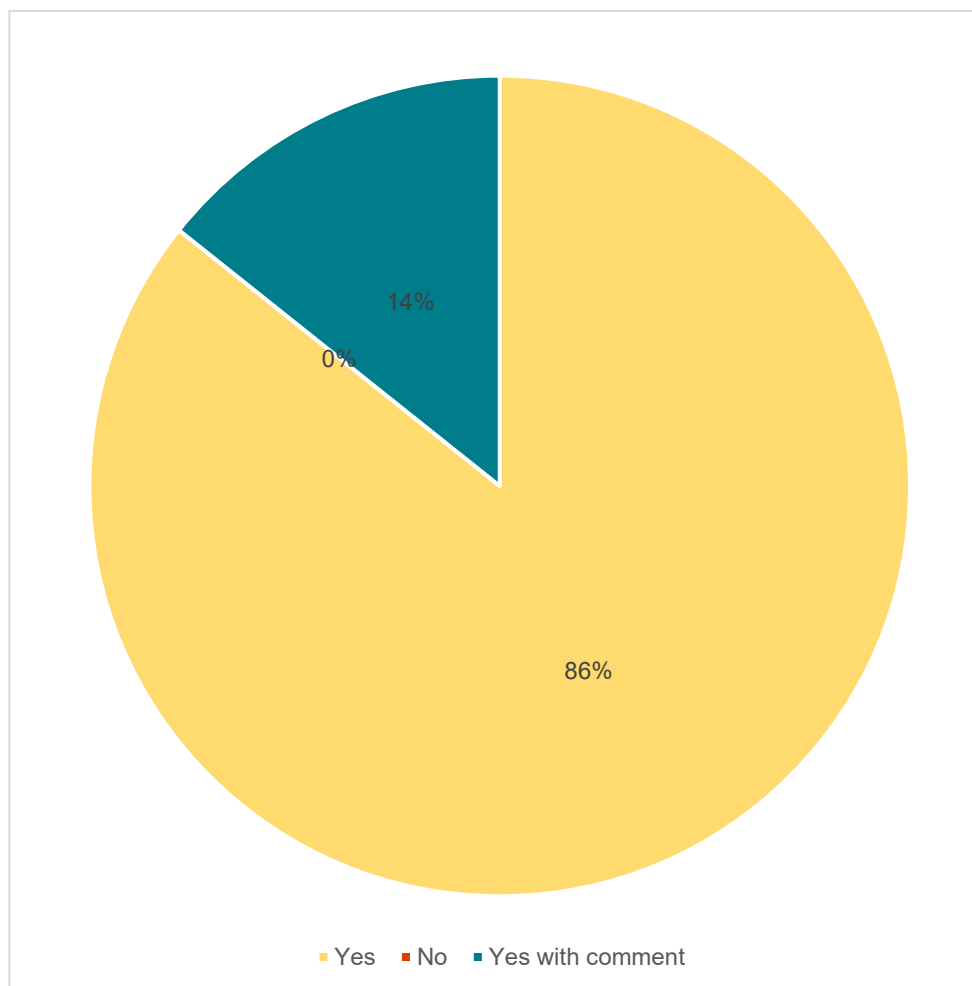
All industry submissions supported the production of codes for both options.

AMSA will implement this option.



## Key Question 5 – Increased details within the manual

**Question 5 - Do you agree with the proposed SAGM 2 amendments to more comprehensibly reflect survey obligations imposed through the NSCV standards?**



*Figure 5: Responses for question 5 - Do you agree with the proposed SAGM 2 amendments to more comprehensibly reflect survey obligations imposed through the NSCV standards?*

*Pie chart: 86% said Yes, 14% said Yes with comment, 0% said No.*

All industry submissions either supported this change or supported with comment.

AMSA will implement the proposed changes.

## Key Question 6 – New definition

### Question 6 - Do you agree with the addition of new definitions for partial and additional surveys?

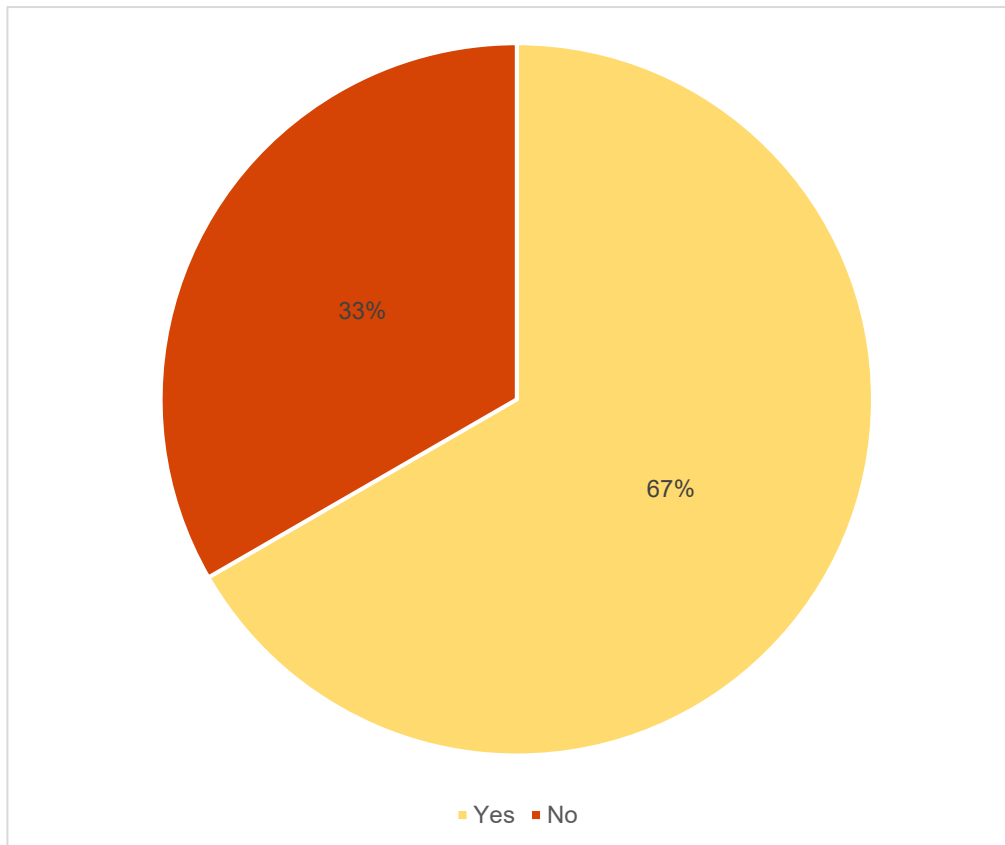


Figure 6: Responses for Question 6 - Do you agree with the addition of new definitions for partial and additional surveys?  
Pie chart: 67% said Yes, 33% said No.

The Majority of respondents supported the additional definitions within the draft of SAGM 2.

### Comment 1

Whilst most industry supported the changes to these definitions some feedback was received asking for more detail to be provided within the additional survey definition.

### AMSA response

AMSA has reviewed these comments and proposes to make the following change to the additional survey definition and Clause 2.8(3):

*Additional survey means a survey undertaken outside the frequency prescribed by National Regulator, either full or partial according to the circumstances, undertaken at the request of the owner to verify compliance with the applicable standards.*

Clause 2.8(3) will be amended to:

- 1) Any changes to the vessel:

- a. must be reported to the National Regulator by the owner in accordance with Marine Order 503; and
- b. surveyed appropriately in accordance with:
  - i. for a vessel that has been subject to a change mentioned in Schedule 1 of Marine Order 503 – the surveys required by Marine Order 503 and Chapters 3 and 4 of this Manual; or
  - ii. for a vessel that has been subject to other changes impacting compliance with applicable standards, an additional survey as defined in this manual.

*Note* Changes that may require an additional survey include significant repairs to the vessel structure, systems or equipment that potentially alter its compliance status. Routine maintenance, minor repairs and replacement of consumables items that do not impact the vessel's compliance do not require additional surveys.

## Explanation

An Owner is required to ensure their vessel continues to meet the applicable standards (see 503 S11(f)). This provision within SAGM is intended to clarify the process surveyors should follow in the circumstances and provide guidance around when it may be necessary.

The process to submit an additional survey is to contact DCV survey and request an “ad-hoc” survey code. This process is already in place as owners often engage AMSs to undertake repair or modification surveys onboard vessels which are submitted to AMSA.

## Comment 2

AMSA also received feedback querying whether the MARS system was able to process partial surveys as now defined within SAGM.

## AMSA Response

The MARS system can process partial recommendations. In fact AMSA already receives partial surveys. For instance, partial recommendations occur when one surveyor undertakes the plan approval for the structure, while another surveyor handles the remaining plan approval elements.

Currently, because a surveyor does not need to indicate this to AMSA or the owner, it can lead to delays or refusal of an application because the remaining aspects of survey are missed.

A primary reason for defining a 'partial survey' is to ensure it is clearly communicated when this division of responsibilities happens, ensuring that all aspects of the survey can be completed and enabling the owner to obtain the necessary certification.



# Other Consultation Feedback

## Other Consultation Feedback

### Feedback Item 1 - Changes to Exemption 40 vessel surveys within Chapter 7

#### Changes to Exemption 40 vessel surveys within Chapter 7

Most industry stakeholders supported the proposed changes to the Exemption 40 survey process contained in Chapter 7. However, two submissions raised concerns: one questioned the data AMSA used to justify the changes and requested that this data be shared; the other asked for clarification on which surveyors were qualified to provide recommendations.

#### AMSA Response

Under the national law, vessel owners are obligated to report incidents, as outlined in Part 5, Sections 88 and 89 of the [Marine Safety \(Domestic Commercial Vessel\) National Law Act 2012](#). AMSA compiles and publishes annual reports on DCV incidents, which include data on structural failures, accessible at AMSA's [incident reports page](#).

For *Marine Safety (Class C restricted operations) Exemption (EX40)* certified vessels, there have been a total of two reported incidents involving damage or structural failure. These incidents resulted in no injuries to crew members, passengers, or other individuals.

AMSA also highlights that the *Marine Safety (Certificates of survey) Exemption (EX02)* fleet, which relies on recreational certification without additional surveyor verification of suitability or vessel condition, has experienced low levels of structural failure and no injuries. Within the EX02 fleet, there have been no reports of structural failure other than following a collision or grounding.

Under the proposed arrangements, EX40 vessels are required to undergo a survey by a surveyor who is accredited with categories mentioned within Table 11 to ensure they are fit for purpose for which the vessel is intended by the owner.

AMSA acknowledges that a portion of EX40 vessels are built to survey standards however, this is not true of all EX40 vessels. The majority are structurally certified using builder documentation or builder's plates. Despite the EX40 fleet including many recreational type vessels since its introduction, there have been no significant incidents of structural failure reported across the EX40 category.

AMSA will make minor amendments to the survey criteria for vessels entering service based on service record to include a more specific reference intended purpose, likely weather conditions and usage patterns.

## Feedback Item 2 - Changes to Marine Order 503 provisions

### Changes to Marine Order 503 provisions

Eight industry submissions proposed modifications to the provisions contained within [Marine Order 503 – Certificates of survey – national law](#) (MO503)

These suggestions include improvements to transitional triggers, requirements for surveys, vessel standards, changes to the timing of surveys and definitions of terms used within MO503.

### AMSA response

As these matters are prescribed within MO503 they are not able to be actioned within this SAGM amendment.

## Feedback Item 3 - Changes to Table 8 and 10 yearly survey items

### Changes to Table 8 and 10 yearly survey items

AMSA received a range of feedback about periodic survey requirements contained in Table 8 and the 10 yearly survey requirements.

### AMSA response

Two submissions suggested changes to the prescriptive requirement to fully disassemble valves at each out-of-water survey. AMSA acknowledges that some valve types, particularly those on smaller vessels common within the DCV fleet, cannot be dis-assembled. This comment was further discussed at the AMS workshops and the consensus from AMS was that extent of inspection should be at their discretion. AMSA will remove the prescriptive requirement to fully disassemble valves from Table 8 and permit the surveyor to undertake the examinations, verifications, tests and trials they consider necessary to be satisfied the valves are in sound condition. AMSA will consider an instruction to surveyors for-valve inspection if it becomes necessary.

One submission suggested additional details be added to the periodic electrical tests for residual current devices' (RCD) earth leakage and insulation resistance. AMSA will add detail about time periods between tests to the RCD and insulation test sections of Table 8.

Two submissions suggested changes to the requirement to fully withdraw the rudder stock every 5 years. This was further discussed at the AMS workshops and a consensus from AMS was that it should be left as is. AMSA has left the requirement as is.

Several submissions asked for more detail and / or guidance to be provided in the 10-yearly survey section. For example, the extent of Non-Destructive Testing (NDT) required.

AMSA further discussed NDT requirements with AMS at the May 24 workshops. Most surveyors believed that UT offered limited benefits for Aluminium construction. Following these discussions AMSA has revised the requirement to provide more discretion to AMS for aluminium vessel surveys and will provide details through the new instructions to surveyors.

One submission recommended revising the 10-yearly sea water piping survey criteria to permit surveyors to use methods other than pressure testing, such as borescope inspection and Ultrasonic Testing (UT). While AMSA recognises the existing pressure-testing criteria as unclear, we believe alternative methods like borescope inspection may not identify issues such as joint leaks and pinholes. AMSA will revise the pressure test criteria to specify that the test should be conducted at working pressure to enhance clarity.

One submission suggested changing the 10-yearly UT requirement to permit the surveyor to employ the most appropriate method. AMSA is in the process of delivering an Instruction to Surveyors (ITS) for UT which clarifies the extent of UT required depending on the vessel material and condition.

One submission proposed that the 10-yearly internal hull inspection requirement should only apply to spaces that are not foam filled. AMSA recognises that the safety benefits of inspecting spaces filled with 90% or more buoyancy foam do not justify the costs, assuming the foam's integrity has been confirmed. AMSA will amend the requirement so that an internal hull inspection is not required for vessels filled with 90% or greater foam, unless there are indications that the foam has been compromised. Note the foam buoyancy must still be inspected at the 10-year survey to verify it is in satisfactory condition.

## Feedback Item 4 - Reasonable period

### Reasonable period

Industry stakeholders have expressed concerns about the timeframes for reporting minor defects, particularly for vessels that are currently in refit or not in operation. These concerns highlight a desire for more flexible reporting deadlines that consider the operational status of the vessel.

### AMSA response

AMSA acknowledges the industry feedback regarding the reporting timeframes for minor defects and deficiencies. However, the obligation to report such issues 'as soon as practicable' is mandated by Section 33 of the Surveyor Accreditation Regulations and cannot be amended as a part of this review to the SAGM. The term 'as soon as practicable' is a standard phrase used across various legislative frameworks and is consistently applied in the maritime regulatory environment. AMSA wrote about the use of this term for surveyors in the [January 2020 survey matters](#).

## Feedback Item 5 - Changes to recommendation with dispute clause

### Changes to recommendation with dispute clause

One submission expressed support for the proposed changes to the recommended dispute clause. However, two other submissions voiced concerns, suggesting that these changes might impact on surveyors' ability to discuss defects or issues with vessel owners. These submissions emphasized a need for AMSA to provide support to surveyors in situations where a vessel exhibits non-compliance or defects.

### AMSA Response

AMSA values the feedback provided regarding the amendments to the "Recommendation with Dispute" Clause 2.9.5 and potential challenges these changes might present to surveyors engaging in discussions with vessel owners about defects.

AMSA can offer support to AMS in these circumstances in the following ways:

- 1) If there is contention between the Owner and AMS as to whether something meets the applicable standards, the AMS may contact AMSA via DCV Survey ([dcvsurvey@amsa.gov.au](mailto:dcvsurvey@amsa.gov.au)) with details and obtain confirmation . A written confirmation can be passed on to the owner.
- 2) The owner can apply for a specific exemption. The applicant will need to detail their reason for needing the exemption. Cost or inconvenience are not sufficient reasons for the National Regulator to issue an exemption and AMSA must not issue an exemption if it may jeopardise safety. The applicant can refer to the AMSA specific exemption policy for circumstances where AMSA may consider granting and exemption.
- 3) The AMS can provide a "not recommended" submission through MARS detailing the individual non-compliance(s). AMSA may then address the non-compliance with the owner through a request for further information or inspection process. Where an owner will not address the issue AMSA will decide based on the information available. This may result in refusal of an application or compliance actions.

It's important to clarify the framework within which AMSA operates and its commitments to ensuring compliance with the applicable standards. Under the legal and regulatory framework within which AMSA operates, there is no provision that allows the dispute of a defect. The legislation is clear that vessels must comply with the relevant standards set forth under the national law and marine orders. This compliance is not discretionary but fundamental and is set from the Act level down. For example:

*Marine Order 503 S11(1)(b)*

*(b) any defect identified in any survey, including a periodic survey, must be rectified;*

In cases of grandfathered vessels, however, where the owner believes a state agency previously approved the arrangement, AMSA may review historical state documents to confirm the presence of previous exemptions or interpretations that applied under state legislation. AMSA introduced the “recommended with dispute” mechanism at commencement of AMSA service delivery, to accommodate such cases with grandfathered vessels.

The dispute mechanism is effective to allow resolution of grandfathering issues. However, there is no mechanism for it to be used to review defects, regardless of their age or previous un-detection, which the owner must rectify as set out within the national law.

It's crucial to understand that the scope for accepting non-compliance under the national law and marine orders is strictly limited. Vessels must comply with the applicable standards.

## Feedback Item 6 - Removal of duplicated Marine Order 503 content from SAGM 2

### Removal of duplicated Marine Order 503 content from SAGM 2

One submission supported the removal of the duplicated content, while another opposed this change, emphasizing that the content serves as an important guidance resource for DCV surveyors.

## AMSA Response

AMSA acknowledges the concerns raised in the opposing submission. AMS are crucial to the effectiveness of the National System and require access to accurate and comprehensive information to effectively engage with the industry. However, retaining duplicated content within the Standards for Accredited Marine Surveyors (SAGM) presents significant challenges and operational inefficiencies.

To ensure compliance with current standards, AMS must refer to [Marine Order 503 — Certificates of survey — national law](#) (MO503) to gain a comprehensive understanding of the requirements. Operating without this knowledge risks undermining the effectiveness of both MO503 and SAGM, leading to potential misapplications of the law. Retention of duplicate content within SAGM leads to incomplete understanding of the regulatory framework applicable to DCV's and can result in incorrect advice and services being provided.

Retaining the duplicated content from MO503 within SAGM would also mean that any amendments to MO503 also requires a corresponding update to SAGM. For instance, any changes aimed at improving the transitional survey triggers in MO503 could not be implemented without a subsequent amendment to SAGM. This not only complicates the amendment process but also delays the implementation of necessary updates that could deliver improved outcomes for the industry.

AMSA acknowledges the need for clear and correct guidance materials for surveyors. However, a sound understanding and knowledge of MO503 is essential for every AMS regardless of any duplication contained within SAGM.





## Feedback Item 7 - Changes to Annexes

### Changes to Annexes

One submission included a suggestion to include a Lloyds Special Service Craft operational envelope in the plan approval template (Annex 2).

### AMSA response

AMSA will add an operational envelope to the example plan approval letter.

## Feedback Item 8 - Additional electrical surveys

### Additional electrical surveys

One submission asked whether AMSA could issue codes for periodic electrical survey.

### AMSA response

This proposal is outside the scope of the current SAGM changes and would result in an additional and not insignificant regulatory impact to vessel owners. Any such change would require a separate impact analysis, stakeholder consultation, careful consideration of the net benefits, as well as the alignment with existing policy and legislative frameworks.

## Feedback Item 9 - Additional changes to the CE scheme

### Additional changes to the CE scheme

One submission suggested additional changes to SAGM that would permit a Module B certificate to be used as evidence of design compliance on its own, for a vessel that is surveyed during construction.

### AMSA response

The European directive article 20 specifies that Module B (EU type-examination) is issued together with module C,D E or F. Whilst a Module B certificate is type –specific, it is AMSA’s

understanding that for the vessel to be considered CE certified, the Module B certificate must be issued together with an accompanying C,D, E or F certificate.

AMSA also notes that the proposed changes to CE certification within SAGM may already resolve this matter. A Class 2 vessel being used for leisure use would no longer require AMS survey during construction or Module B+D certification and could be accepted with B+C in most circumstances. AMSA has not made any changes to this section.

## Feedback Item 10 - Shipyard capability

### Shipyard capability

Two submissions supported the proposed changes to this provision. One submission requested a definition and measurement criteria for 'shipyard capacity,' detailed descriptions of the capabilities required for builders, and the baseline qualifications that AMSA requires.

### AMSA response

The details requested are set out within SAGM 2 clause 3.3. To verify a builder's capacity, an AMS should confirm that the builder has a system in place covering the items listed in (2) as applicable. This verification is typically conducted by the AMS performing the construction surveys. If the construction surveys are divided among multiple surveyors, each surveyor should verify the builder's capacity relevant to their aspect(s) of the survey.

Verification of shipyard capacity is a crucial aspect of survey that ensures builders have a system in place for constructing vessels according to approved plans, and to coordinate with surveyors for key inspections.

## Feedback Item 11 - Additional instructions for surveyors, forms or other content

### Additional instructions for surveyors, forms or other content

Industry recommended development of a range of guidance materials that would be beneficial to AMS including:

- Instructions for inspection of fuel tanks onboard small vessels
- Additional guidance on repair services
- Updates to forms 673 and 706 to align with Table 6.
- Inclusion of owners' obligation to ensure a vessel complies with standards added to certificates (SAGM 4.12.3)

- Other additional content added to the vessel's certificate of survey such as 10-year dates, standards that apply etc.

### AMSA response

Most of the suggested changes fall outside the scope of this SAGM review. AMSA will consider these topics for future updates to ITS, forms, and certificates. It is important to note that additional details about a vessel, such as 10-year inspection dates and applicable standards, are available on the vessel report provided to the owner. This report can be generated by an AMS through their online MARS portal if these details are recorded.

## Feedback Item 12 - Survey criteria for Temporary operations exemptions

### **New chapter specifying survey criteria for *Marine Safety (Temporary operations) Exemption (EX07)* divisions**

One submission suggested an additional chapter within SAGM to define the survey requirements for temporary approvals issued under *EX07*.

### AMSA response

AMSA has published DCV-ITS-002 for signing documents in accordance with Divisions 3 (sea trials), Division 5 (minor non-conformances after periodic) or Division 6 (minor non-conformances after renewal) of *EX07*.

The remaining divisions of *EX07* are assessed by delegates on a case-by-case basis. They do not have a prescribed condition requiring a specific survey to be conducted in accordance with SAGM. As such AMSA cannot include survey criteria within SAGM for these divisions. Such a matter would need to be prescribed within the conditions of the exemption.

## Feedback Item 13 – New chapter for towing surveys

### **Towing surveys**

One submission suggested AMSA should provide guidance on the requirements for vessels intended to be towed within SAGM.

## AMSA response

There is no normative requirement for pre-towage type surveys in the National Law. AMSA has [guidance on towage](#) available on our website.



## Feedback Item 14 – Requirements for dive surveys

### Dive surveys

Two submissions suggested including an option for dive surveys in SAGM.

### AMSA response

AMSA will continue to consider requests for dive survey on a case-by-case basis through the alternate survey process.

**[amsa.gov.au](http://amsa.gov.au)**