



AMSA POLICY ON SURVEY REQUIREMENTS FOR DOMESTIC COMMERCIAL VESSELS EQUAL TO OR GREATER THAN 35 METRES

AIM

The Australian Maritime Safety Authority (AMSA) is the Commonwealth Government agency responsible for maritime safety, protection of the marine environment, and maritime and aviation search and rescue. In undertaking this statutory role, AMSA is committed to implementing its [Statement of Regulatory Approach 2022](#). This policy is aligned to our Statement of Regulatory Approach and sets out AMSA's approach to regulating domestic commercial vessels ≥ 35 metres in length.

In line with the requirements of [Marine Order 503 \(Certificates of survey — national law\) 2018](#) (MO503), vessels ≥ 35 metres are required to be surveyed by a Recognised Organisation (RO) and have a classification certificate in force.¹ The requirement for RO survey is necessary to ensure that the vessel design, construction and ongoing maintenance of these vessels, that are generally higher risk and higher complexity, meet an appropriate standard and that the survey is undertaken by an appropriately qualified surveyor.

However, AMSA recognises that in certain circumstances, vessels that are ≥ 35 meters are lower complexity and lower risk, and simply fall into RO survey by virtue of their length. It may be appropriate for these vessels to be exempt from the requirement in MO503 to be surveyed by an RO and have a classification certificate in force.

An applicant may apply for an exemption from the requirement for a vessel to be surveyed by an RO using AMSA form 547.

SCOPE

Vessel surveying is a system of quality verification employed during the design, construction, and service life of a vessel to mitigate foreseeable risks. This survey verifies that the builder has implemented quality control processes during construction, and that the owner undertakes an appropriate standard of maintenance throughout the service life of the vessel. The survey's primary aim is to ensure the safety of onboard individuals, the environment, and the vessel itself. The survey regime is strategically designed to correlate survey requirements with risk levels. This approach not only upholds safety standards but also seeks to minimize compliance costs where feasible.

As a part of the 2017 *Decision Regulation Impact Statement – Survey under the National System for Domestic Commercial Vessel Safety*, AMSA committed to amending the survey requirements for larger domestic commercial vessels to ensure they remained risk based and proportionate, whilst reducing the operational burden and cost to operators where possible.

In line with this commitment, owners and operators of lower risk and lower complexity vessels ≥ 35 metres may apply for a specific exemption allowing their vessel to be surveyed by an accredited marine surveyor (AMS) rather than an RO.

If granted, these specific exemptions will permit certain vessels:

- up to 45 metres in length to undergo design, construction, commissioning and load line survey by an AMS instead of an RO; and
- up to 65 metres in length to undergo periodic survey by an AMS instead of an RO.

¹ Unless the vessel is an existing or transitional vessel and the survey process that applied to the vessel when it was last surveyed before 1 July 2013 permitted the vessel to be surveyed by a person other than a Recognised Organisation.

AMSA will assess each application for a specific exemption on a case-by-case basis. The decision to grant a specific exemption is at AMSA's discretion and based on an assessment of the safety risks of the vessel and its operation, in line with this policy statement.

AMSA will continue to review this policy, which may inform future regulatory reform.

POLICY STATEMENT

Owners and/or operators of domestic commercial vessels ≥ 35 metres may apply for a specific exemption to undergo survey by an AMS instead of an RO. AMSA will consider granting an exemption based on the operational risks that the vessel presents.

Safety and protection of the marine environment are AMSA's primary aims. Applications for a specific exemption must demonstrate that the vessel will continue to meet the principles and outcomes of the requirements under MO503. We aim to work with those we regulate to arrive at practical regulatory outcomes that provide for the safety of the vessel and all persons on board, and the protection of the environment.

AMSA may impose additional survey requirements and standards to vessels granted an exemption from the requirement to be surveyed by an RO. The vessels will also continue to be required to comply with MARPOL and other applicable international conventions.

Cost recovery for assessment

AMSA charges an hourly rate to assess an exemption as set out on the [fees for service page](#). Generally, AMSA charges 1.5 hours assessment time for an exemption and invoices if AMSA considers the assessment time will be longer. However, typically exemptions from the requirement to be surveyed by an RO take at least 12 hours and applicants should be aware they will be invoiced accordingly with payment required before an assessment will be undertaken. Moreover, if documentation is not sufficient to conduct the assessment on first review further hours may be charged.

Eligibility criteria

Accredited Marine Surveyor

Only appropriately qualified and accredited AMS will be permitted to survey a vessel that has been granted an exemption. When deciding if an AMS is appropriately qualified and accredited, AMSA will consider:

- previous experience conducting plan approval of vessels of the type and size
- previous experience conducting survey of vessel of the size with an RO
- familiarity with class rules including survey scope for vessel class notation
- the surveyor's audit history with AMSA
- the surveyor's formal qualifications
- evidence the surveyor is familiar with and capable of implementing inspection and testing plan, and
- evidence the surveyor is familiar with the applicable survey standard for the type of vessel.

Matters AMSA generally considers as risk factors

AMSA considers the following factors to be high risk, which would generally make a vessel ineligible for a specific exemption:

- propulsion power of $>2,000\text{kW}$ (by direct calculation)
- carriage of dangerous goods including petroleum or gas products (other than petroleum or gas products intended for use on the vessel or fireworks carried on the vessel only for use on the vessel for a fireworks display)
- vessels which are Category 1 Fast Craft $\geq 500\text{GT}$

- un-crewed vessels (autonomous)
- novel vessels as defined in NSCV Part B
- submersibles, and
- vessels with:
 - steam plant
 - dynamic positioning systems
 - FIFI systems
 - pressurised systems
 - dredging equipment
 - complex cargo handling systems
 - towing arrangements
 - integrated propulsion systems (centralised controls)
 - self-loading and discharging systems.

Other matters AMSA may consider

AMSA may also consider the following factors when deciding whether to grant a specific exemption:

- the general availability of AMS, with the required skills as referenced above, within the market to conduct the required surveys
- overnight accommodation
- carriage of cargo
- anti-heeling systems
- certain unmanned machinery installations or other aspects of automation and instrumentation
- hull type and form, and
- redundancy of propulsion machinery.

Survey requirements

When granting a specific exemption, AMSA may apply a range of conditions that will be applicable to the vessel. Conditions will be applied at the discretion of AMSA and listed on the specific exemption.

A decision to impose a condition on an exemption is a reviewable decision under section 139 of the National Law.

Examples of the types of conditions that may be applied include (but are not limited to):

- The owner must ensure that the vessel is operated in compliance with any limitations or conditions that applied when the most recent classification certificate was in force.
- The owner must ensure the vessel is surveyed for MARPOL compliance by a recognised organisation or AMSA to the requirements of the National Law – Marine Surveyors Accreditation Guidance Manual Section 4.14.
- The owner must ensure that a planned maintenance system, covering inspection and maintenance of the vessel's hull, machinery and electrical systems, must be implemented; with records to be made available to a surveyor or the National Regulator upon request.

- The owner must ensure that the vessel meets State and Territory requirements for waterway management, pollution and workplace safety.
- The owner must ensure the national regulator is able to conduct or witness any inspection or test deemed necessary to verify the survey process applied to the vessel.
- The owner must ensure the initial survey plan approval is not conducted by the vessel designer or an employee of the design company.
- The owner must ensure the shipyard implements a documented quality control system which controls the following activities:
 - i) Receipt storage and issue of materials, equipment etc.
 - ii) Fabrication environment.
 - iii) Weld procedures and welder performance.
 - iv) Production fabrication.
 - v) Inspection of production processes.
 - vi) Installation of machinery and essential systems.
 - vii) Fitting-out.
 - viii) Tests and trials.
 - ix) Drawings and document control.
 - x) Records.
- The owner and surveyor must ensure the documented quality control system includes written procedures that describe clearly and unambiguously how each of the activities specified (i-x) are carried out, when it is carried out and by whom. This may be in the form of an inspection and testing plan, specific to the vessel, that forms a part of the quality system.
- The owner and surveyor must ensure a vessel <45 metres is designed and constructed in accordance with the NSCV Parts C1, C2, C4, C5, C6, C7 and either the applicable Lloyds rules for construction or the applicable Bureau Veritas rules for construction.
- The owner and surveyor must ensure that the vessel survey includes the scope set out in the relevant Recognised Organisation's class rules and references the specific rule name/s.