



Australian Government
Australian Maritime Safety Authority



Consultation Feedback Report

National Standard for Commercial
Vessels, Part C – Design and
Construction, Section 7 – Equipment,
Sub-section 7A – Safety equipment
(NSCV C7A) Edition 4.0



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Introduction

The Australian Maritime Safety Authority (AMSA) has developed a new edition (4.0) of the National Standard for Commercial Vessels, Part C – Design and Construction, Subsection 7A – Safety Equipment (NSCV C7A).

NSCV C7A is a regulatory standard setting out minimum safety equipment requirements for survey type Domestic Commercial Vessels (DCVs). It interacts with a number of other Standards, including [SOLAS](#), [Marine Order 25 \(Equipment – lifesaving\) 2014](#), and relevant State & Territory legislation. It is not a comprehensive guide to maritime safety equipment.

The planned commencement date of the new Standard is 01 July 2027.

AMSA invited feedback from Australia's domestic commercial vessel (DCV) sector through a public consultation process to ensure the proposed changes to NSCV C7A would be relevant and fit for purpose in ensuring vessel safety.

The purpose of this document is to outline our public consultation approach, provide a summary of the feedback we received, and illustrate how this feedback has shaped the new edition of NSCV C7A.



Consultation approach

AMSA seeks to have effective and respectful two-way communications with our regulated community. Consultations on the proposed changes to NSCV C7A were facilitated through a dedicated online consultation hub, which sought public submissions over an eight week period between **3 October 2023** to **27 November 2023**

To facilitate this process, we published the following on the consultation hub:

- a summary of key proposed changes and a detailed change table with reasons for the changes
- a draft revised NSCV C7A with the proposed changes highlighted
- an online feedback form containing a set of seven targeted consultation questions.
- Frequently asked questions about the proposed changes.
- AMSA's regulatory costing analysis for the proposed changes to NSCV C7A.

During the consultation period AMSA received comprehensive responses from across the regulated community, including individual vessel operators, vessel operating companies, fisheries industry representatives, and government departments and agencies. AMSA wishes to express its thanks to all those who participated in the consultation process.

Proposed changes

The public consultation invited feedback on the following key changes to NSCV C7A:

- Significant general content improvement to reduce unnecessary complexity, clarify requirements for each vessel service class, and improve language throughout the document.
- Updated and clarified liferaft type, carriage, stowage, and servicing standards, including equipment and ration options for specified vessels and operational areas.
- Updated and clarified lifejacket type, carriage, and servicing standards, including provisions for infant-size lifejackets, inflatable lifejackets, and transitional arrangements for non-compliant lifejacket types.
- Updated and clarified medical and first aid equipment carriage requirements.
- Improved usability and alignment with associated regulatory standards (i.e., SOLAS and relevant *Marine Orders*), including the incorporation of alternative arrangements for Class C fishing operations as set out in *Maritime Safety (Certificates of survey) exemption 2025* (EX02).
- Updated transitional arrangements incorporating the key proposed equipment carriage requirements



Targeted consultation questions

During the public consultation, AMSA invited stakeholders to respond to the following questions via the online feedback form on the consultation hub:

- Do you have any significant concerns with any of the proposed changes?
- Are the proposed updates to lifejacket standards clear?
- Are the proposed updates to liferaft standards clear?
- AMSA proposes to allow certain smaller vessels to carry smaller lighter non-ISO <4 person liferafts as alternatives to ISO liferafts. Do you support this change?
- In 4.2 (7) of the draft, 'factor of safety' ratings for lifeboat and rescue boat launching apparatus lifting gear are listed. Do you have any concerns with the ratings listed?
- Annex F, F(2) of the draft provides an example of 32kg/m³ (from USL code s10, appendix N) as required for foam for buoyant material in buoyant devices (i.e. carly floats). Do you have any concerns with that density?
- Do you have any specific feedback on other topics? Please review the topics in the summary of changes and let us know what you think.

AMSA also developed a set of frequently-asked-questions, with answers, to assist respondents engaged with the proposed changes and develop their responses to the consultation questions above. This resource is available online: [Frequently asked questions about the changes to C7A \(amsa.gov.au\)](https://www.amsa.gov.au/frequently-asked-questions-about-the-changes-to-c7a).

Other feedback

Prior to public consultations, AMSA consulted internally with Marine Inspector units, who monitor NSCV C7A compliance, to assist with developing the proposed changes. AMSA also consulted with the National Safety Committee to identify any potential safety and industry concerns. Members of the National Safety Committee included industry stakeholders appointed for their expertise and ability to represent the wider interests of their stakeholder group across the regulated community for domestic commercial vessels.



Consultation Feedback

Summary of submissions

AMSA received 41 public submissions through the online feedback portal. The submissions addressed 7 targeted consultation questions, which encouraged stakeholders to provide specific feedback on Chapters 1 to 6 and the Annexes, as well as general feedback. Table 1 provides an overview of these submissions.

Table 1: Submissions received during the public consultation period

Key issues arising from feedback and AMSA responses

Respondents provided comprehensive and substantial feedback to all seven consultation questions and addressed the proposed changes to NSCV C7A in its entirety. These issues were then considered by a subject matter expert (SME) working group made up of staff from across AMSA. Responses and consequential amendments to NSCV C7A are captured below. Note that all references in this section to Tables, Sections or Annexes have been updated to reflect where they sit within the finalised draft rather than their locations within the external consultation draft.

General issues

Financial Implications

Some respondents expressed concerns about the financial cost of purchasing new safety equipment in order to comply with the updated standards. Most of these comments related to lifejackets or liferafts.

AMSA Response

As part of the consultation process, AMSA prepared a regulatory costing which indicated a net industry saving of approximately \$150,000. Although there will be some increased costs for some operators, this is balanced against the overall improved safety across Australia's domestic commercial vessel fleet.

Overall complexity and readability

Several stakeholders expressed a concern that NSCV C7A is generally too complex. The nature and extent of these concerns varied. Some comments related to the complexity of specific proposed changes, others related to specific sections of the document which were

not included in the proposed changes; some related to the structure of the document rather than its content.

A number of stakeholders sought to clarify how and where NSCV C7A aligned with other regulatory standards. For example, one stakeholder expressed concern that the reader needs to refer to other parts of the NSCV in order to ascertain compliance.

Some stakeholders sought to clarify the use of abbreviations, suggesting all abbreviations should be written in full to ensure that the document is accessible for non-specialist readers. A stakeholder suggested that it might be important to include the definition of an AIS EPIRB given it might be required safety equipment.

Stakeholders suggested amendments to the structure of the document itself. One suggested that the order of *Chapter 5* be amended, to group the three sections which relate primarily to liferafts.

AMSA Response

During drafting significant improvements have been made to the layout, design and content, to reduce complexity and improve readability. This included consolidation of Annexes and Tables.

Defined terms or specifications that already exist elsewhere in the regulatory framework continue to be referenced rather than duplicated, as duplicating is likely to create future complications or risk inconsistency following future standard updates.

Several new definitions have been added to NSCV C7A to reduce ambiguity and aid in compliance. All instances of unexpanded abbreviations identified have been expanded.

Tables 1, 2, 3, and 4 redesigned for clarity, removing Tables 3A and 4A.

Lifejackets

The majority of stakeholders found the new proposed requirements relating to lifejackets to be clear.

Lifejacket servicing requirements

Proposed changes to *Chapter 6* would require that lifejackets be serviced 'by a person who is trained, competent and certified by the manufacturer to conduct the servicing.'

Feedback included the following suggestions regarding lifejacket servicing:

- Provide clarity on whether certification would require formal documentation.
- Allow lifejackets to be serviced by 'competent persons' who have been appropriately trained and assessed, but *not* formally certified by the manufacturer.
- Consider the impracticalities of regular manufacturer servicing for remote area operations.

Mandate all lifejackets to be serviced every twelve months, regardless of manufacturers' instructions.

AMSA Response**Lifejacket donning instructions**

A stakeholder suggested that the requirement for pictorial lifejacket donning instructions to be displayed at the vessel muster point duplicates the effect of routine crew drills. Another stakeholder suggested that the requirement for all lifejackets on a vessel to have the same donning method would prevent a vessel from carrying different jackets for infants and adults, or for passengers and crew, further suggesting that the risks are addressed by safety induction requirements set out in MO504.

AMSA Response

AMSA intends to retain the requirement to display donning instructions as an additional risk control to routine crew drills. This takes account of the potential variability in passenger ability and familiarity with donning lifejackets. Given that lifejacket donning happens in an emergency, passengers may require additional guidance beyond the routine induction drills.

Clarification has been added to the keys of Tables 2, 3 and 4 regarding different donning methods, including for child and infant lifejackets.



Infant-sized lifejackets

A respondent suggested that the requirement for specified vessels to carry reserve infant-sized lifejackets should also extend to Class 1C passenger vessels. Another suggested this requirement be mandated for all Class 1 vessels.

AMSA Response

Inflatable lifejacket re-arming kits

Two stakeholders suggested that the requirement for vessels operating in B or C waters to carry a re-arming kit for all inflatable lifejackets (Table 2, Table 3, Table 4) may not be practical or effective. They suggested that crew may or may not be competent to re-arm the lifejackets on the water, and lifejackets could always be reliably re-armed onshore.

AMSA Response

AMSA has modified the requirement to carry rearming kits for inflatable lifejackets. The table 2, 3 and 4 keys have been amended to detail minimum spare re-arming kits based on the number to the number of inflatable lifejackets carried.

All vessels should have at least one crew member trained and competent to re-arm inflatable lifejackets to meet other legislative requirements (such as the *National Law General Safety Duties*, the *WHS Act 2011* and *Marine Order 504*).

Spare lifejackets

The proposed changes to Chapter 5 include a requirement that where vessels are only carrying inflatable lifejackets, they must also carry one or more spares (Table 2, Table 3, Table 4). One stakeholder suggested that it should be explicitly specified that the spare lifejackets must also be inflatable.

AMSA Response

AMSA does not intend to impose that requirement. Spare lifejackets do not need to be of the inflatable type. Other types of standard compliant lifejackets (such as foam lifejackets) would meet the intent of this requirement.



Liferafts and Rescue Boats

Liferafts on smaller vessels

Feedback regarding liferafts on smaller vessels included:

- concern with the safety risk of not requiring <7.5m vessels without level flotation to carry a liferaft;
- the practicalities of carrying liferafts on small vessels eg weather exposure, stowage, vessel stability, and transferability;
- liferaft storage reduces catch space potentially posing a financial burden for small fishing vessels.

AMSA Response

Liferaft colour

A stakeholder suggested that safety equipment colour be considered for vessels operating in waters with saltwater crocodiles which are thought to attack bright objects.

AMSA Response

AMSA does not intend to make changes to safety equipment colour requirements. The claim could not be verified and other safety considerations need to be taken. This is more appropriately addressed through the vessel's SMS.

Factor of safety ratings for launching and retrieval equipment

The majority of stakeholders indicated no concern with the factor of safety ratings for the structural components of lifeboat and rescue boat launching and retrieval equipment.

Feedback included that:

- the ratings remained unchanged from the current edition of NSCV C7A,

- further detail should be provided, and the specific technical standard applied referenced.

AMSA Response

Liferafts and rescue boats – Other matters

Other feedback relating to liferafts and rescue boats included:

- A suggestion to mandate that applicable vessels have emergency source of electrical power to provide sufficient illumination for launching lifeboats and rescue boats to align with SOLAS.
- A suggestion that NSCV C7A should include provisions mandating liferaft launch and retrieval drills.
- A note that the design and construction standards for non-SOLAS rescue boats set out in Annex A refers to AS 2677, which has been withdrawn

AMSA Response

AMSA does not intend to amend NSCV C7A with regards to emergency power source for illumination. The current wording is considered fit-for-purpose and could be reviewed in future iterations of NSCV C7A if needed.

Liferaft launch and retrieval drills is an operational matter, which should be managed through the vessel's SMS (MO504).

References to AS 2677 have been removed. References to the relevant international standard ISO 6185 are retained.

Medical equipment and first aid kits

Professional medical advice

One stakeholder suggested that mandating that owners and operators of B water vessels seek advice from medical practitioners regarding additional medical equipment should be optional not mandatory. They suggested that NSCV C7A should retain the original wording 'should' rather than the proposed amendment 'must' on the grounds that medical practitioners may not have familiarity or expertise relevant to the marine environment, or to the differences between different marine environments.

AMSA Response

AMSA has modified this requirement to a note for information.



Location and accessibility of first aid kits

Feedback included:

- that a requirement for first aid kits to be accessible to everyone could create conflict with the requirement to abide by State & Territory requirements for the secure storage of any prescription and controlled medicines which are required contents of a first aid kit
- that the use of 'must' rather than 'should' when specifying first aid kit storage locations is too restrictive for some vessel configurations.

AMSA Response

Medical equipment

Feedback regarding medical supplies and equipment requirements included:

- a suggestion to add aspirin to the required contents of all first aid kits on DCV's for the management of a patient with a suspected heart attack.
- A suggestion that the required contents of first aid kits set out in Scales E, F, and G should include a defibrillator, for vessels operating more than two hours from outside medical assistance

AMSA Response

AMSA does not intend to mandate the carriage of aspirin, as medical advice sought does not support this suggestion. Scales E, F, and G have been updated to include an optional defibrillator, noting that Scale D, applicable to Class 1B vessels, mandates a defibrillator.

Other issues

Defining hazardous waters

Feedback regarding the definition of 'hazardous waters' included:

- a suggestion that it remain broad to recognise risks posed by any dangerous fauna and not be limited to crocodiles and box jellyfish.
- a suggestion to increase 15°C monthly average sea surface temperature to 20°C for the purpose of setting out anti-exposure suit requirements for rescue boat crews

AMSA Response

AMSA does not intend to broaden the definition of hazardous waters. Previous feedback from stakeholders supports the view that 'hazardous flora and fauna' is too broad and could be taken to include all Australian waters. This places additional safety requirements and costs on all vessels which is not the intent.

AMSA does not intend to alter monthly average sea surface thresholds as the standard aligns with SOLAS III. Amending the average temperature to 20°C is estimated to extend hazardous waters from South of 37.5°S (equivalent to the latitude of the Bass Strait) to approximately 30°S (equivalent to the latitude of Brisbane). This change would have significant cost implication, unsupported by safety incident evidence.

Buoyant appliances

Feedback regarding buoyant appliances included:

- a query as to whether Life Cells satisfied the requirements for a buoyant appliance, as set out in Annex D5,
- a query whether Class 1 passenger vessels operating in sheltered waters should be required to also carry buoyant appliances if the vessel has level flotation,
- a comment that the requirement for certain vessels to carry buoyant appliances for a 100% complement where they otherwise wouldn't be required to is unclear (Key in Table 2), and whether this provision could be incorporated into the main column of requirements, rather than the key.

AMSA Response

Dinghies

Feedback on dinghies included:

- that marking requirements for dinghies be only applied only to dedicated survival dinghies, (Annex B)
- a note that there are no lifting system standards for dinghies (Annex B).

AMSA Response

AMSA has modified the standard to clarify that dinghy marking requirements only apply to dinghies carried as safety equipment,

AMSA has added a section for dinghy lifting points and lifting systems into Annex B.



EPIRBs, VHF Radios, and general emergency alarm systems

Feedback included:

- that the requirement to carry an AMSA registered EPIRB as part of alternative liferaft arrangements was duplicated in 2 places in the draft and further noted it would be redundant to stow a float-free EPIRB in a grab bag.
- a suggestion that NSCV C7A should compel recreational vessels to use DSC VHF radios, highlighting safety hazard for DCVs if recreational vessels are not contactable via VHF
- that Table 1 does not contain performance standards for General Emergency Alarm Systems, specified in Table 2, Table 3, and Table 4, and suggested it could incorporate the standards set out in the IMO LSA Code 7.2.1.

AMSA Response

Alternative arrangements for fishing vessels

Feedback included:

- a comment that lifejacket wear can increase safety risk on fishing vessels, due to the risk of entanglement with fishing equipment.
- A comment that some inshore fishers operate in waters which may be too shallow (<5m) for hydrostatic release units to be effective.
- suggestion to consolidate alternative arrangements for Class 3 fishing vessels into comprehensive safety equipment standard, specifically for fisheries.

AMSA Response

AMSA has amended the standard to specify manually-activated EPIRBs as part of liferaft equipment requirements and to include alternative liferaft equipment options for specified vessels.



Transitional / interim arrangements

A stakeholder suggested that AMSA should ensure that the interim arrangements set out in Annex I should be accompanied by targeted industry communications, to prevent supply bottlenecks and facilitate compliance.

AMSA Response

AMSA noted this suggestion which will be taken into account during roll-out communications.

Alignment with State & Territory regulations

A stakeholder suggested that NSCV C7A requirements should be aligned with State & Territory safety equipment requirements for recreational vessels.

AMSA Response

NSCV C7A requirements align with State and Territory requirements where possible, however recreational vessel requirements are not always appropriate for vessels in commercial service.

Summary of key changes made in response to feedback

Many changes were made to the standard as a result of public consultations. The key changes are summarised in Table 2, below.

Table 2: Consequential amendments

Issue / Topic	Changes
Editorial changes	• Tables and annexes combined where appropriate to improve readability. • Acronyms and abbreviations are written out in full at first use within the standard.
Chapter 1 – Preliminary	
	• Definition of ‘accredited servicing supplier’ clarified. • Definition of ‘hazardous waters’ updated.
Chapter 2 – Required Outcomes	
	N/A
Chapter 3 – Safety Equipment Design and Construction	
	• Performance standards for general emergency alarm systems added.
Chapter 4 – Installation of Safety Equipment	
	N/A
Chapter 5 – Type and Quantity of Safety Equipment	
	• Reserve lifejackets for infants and children carriage requirements updated to include 1B, 2B, 1C, 1D vessels. • Requirement to carry re-arming kits for inflatable lifejackets amended to be related to the number of lifejackets carried. • Liferaft equipment and ration requirements updated for specified vessels. • Requirements for the carriage of buoyant appliances for Class 1 vessels clarified.

Chapter 6 – Servicing of Safety Equipment

- Lifejacket servicing requirements clarified with increased flexibility.

Annex A – Standards for Marine Safety Equipment

- Removed due to section redundancy (content migrated to Chapter 5).

Annex B – Standards for non-SOLAS Rescue Boats

- Additional detail provided regarding the factor of safety for liferaft lifting equipment, including standards.
- References to AS 2677 removed.
- Updated to Annex A.

Annex C – Standards for Dinghies

- Annex now STANDARDS FOR DINGHIES CARRIED AS SAFETY EQUIPMENT.
- Requirements for lifting points added.
- Updated to Annex B.

Annex D – Standards for Inflatable Coastal Liferafts**Annex E – Requirements for Open Reversible Liferafts**

- Consolidated STANDARDS FOR LIFERAFTS.
- EPIRB carriage requirements updated.
- Updated to Annex C.

Annex F – Standards for Buoyant Appliances (Excluding Lifebuoys)

- Updated to Annex D.

Annex G – Requirements for Coastal Lifejackets (Current in force version)

- Removed.

Annex G – Standards for Hydrostatic Release Units (External consultation version)

- Updated to Annex E.

Annex H – Standards for First Aid and Medical Supplies

	• Requirement for operators of vessels operating in B waters to seek medical advice regarding additional first aid supplies amended to an optional guidance note. • Required storage location of restricted substances updated to enable operator compliance with state and territory laws. • Additional options for acceptable locations of first aid kit introduced. • Defibrillators added as optional equipment for schedule F and G first aid supplies. • Updated to Annex F.
Annex I – Interim Arrangements for Vessels to Comply with C7A	
	• Updated.
Annex J – SOLAS Chapter III Requirements	
	• Removed.
Annex K – Guidelines Concerning the Use and Fitting of Retro-Reflective Material on Life-Saving Appliances	
	• Removed.
Annex L – Alternative Standards for Inshore ‘Warm Waters’ Fishing Vessels	
	• Updated to Annex G.
Annex M – Alternate standards for Beach Fishery Vessels	
	• Updated to Annex H.

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