Australian Government



Department of Infrastructure, Regional Development and Cities

Australian Maritime Safety Authority

## AUSTRALIAN MARITIME SAFETY AUTHORITY

## COST RECOVERY IMPLEMENTATION STATEMENT

### Provision of infrastructure to support safe navigation in Australian waters, environmental marine protection, seafarer and ship safety, and marine services

2018-19

Cost recovery involves government entities charging individuals or non-government organisations some or all of the efficient costs of a regulatory charging activity. This may include goods, services, or regulation, or a combination of them. The Australian Government Charging Framework, which incorporates the Cost Recovery Guidelines<sup>1</sup>, sets out the framework under which government entities design, implement and review regulatory charging activities.

<sup>&</sup>lt;sup>1</sup> The Australian Government Charging Framework and the Cost Recovery Guidelines are available on the Department of Finance website finance.gov.au.

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## 1 Introduction

### **1.1 Purpose of Cost Recovery Implementation Statement**

This Cost Recovery Implementation Statement (CRIS) provides information on how the Australian Maritime Safety Authority (AMSA) implements cost recovery for provision of infrastructure to support safe navigation in Australian waters, environmental marine protection, seafarer and ship safety, and marine services. It contains financial forecasts for 2018–19 and 2019–20.

We will continue to maintain the CRIS while cost recovery for these activities continue.

The CRIS provides stakeholders with key information on the application of cost recovery activities, including financial and non-financial performance. It assists stakeholders to understand our costs, which strengthens accountability, provides transparency, and demonstrates compliance with the Regulatory Charging General Policy Order.

### **1.2** Description of the regulatory charging activity

#### 1.2.1 Policy background

Our policy is to 'minimise the risk of shipping incidents and pollution in Australian waters through ship safety and environment marine protection regulation, and to maximise people saved from maritime and aviation incidents through search and rescue coordination<sup>2</sup>'.

#### **1.2.2** Description of the activities

Cost recovery regulatory charging activities undertaken by us are summarised in **Table 1**, with the activity outputs in brackets.

Activity groups	Description
Navigation infrastructure (Marine Navigation Levy)	Support the national network of integrated aids to navigation (AtoN) and traffic management measures in Australian waters <sup>3</sup> to ensure safe and efficient coastal navigation of the commercial shipping industry. This includes the provision of technical maintenance and engineering project management services.
	<ul> <li>Activities include:</li> <li>measures to meet Australia's international obligations under International Convention for the Safety of Life at Sea (SOLAS)</li> <li>the International Association of aids to navigation and Lighthouse Authorities (IALA) and</li> <li>other international cooperative groups.</li> </ul>
Environmental marine protection (Protection of the Sea Levy)	Resource the National Plan for Maritime Environmental Emergencies (National Plan), which is a cooperative arrangement between the Commonwealth, State and Northern Territory, and the commercial shipping industry.
	<ul> <li>The National Plan details processes about pollution response incidents including: <ul> <li>funding arrangements for cleanup costs relating to ship sourced pollution</li> <li>pollution that cannot be attributed to any specific vessel or cannot be wholly recovered from insurance providers.</li> </ul> </li> </ul>
	Another primary function is the maintenance of preparedness to combat pollution by ensuring there is adequate capability to respond to incidents through: • training of personnel in response techniques

Table 1: Descriptions of regulatory charging activities

<sup>&</sup>lt;sup>2</sup> Department of Infrastructure, Regional Development and Cities, Portfolio Budget Statement 2018–19, Budget Related Paper No. 1.12, page 86 (<u>https://infrastructure.gov.au/department/statements/2018\_2019/budget/files/2018-19\_PBS\_DIRDC.pdf</u>).

<sup>&</sup>lt;sup>3</sup> AMSA does not provide navigational aids within port boundaries; these are the responsibility of the port operator.

Activity groups	Description
	<ul> <li>the acquisition, maintenance, and stockpiling of relevant equipment and supplies at key sites around Australia and</li> <li>provision of emergency towage capability.</li> </ul>
Seafarer and ship safety (Regulatory Function Levy)	Conduct a range of maritime safety and regulatory activities on international and national commercial shipping operations. This consists of compliance inspections and audits undertaken on a risk based sample approach. A fundamental component of the activity is port State control, which are inspections ensuring vessels and ship owners comply with regulations relating to vessels, crew, and the marine environment.
	Other inspections and audits include: • flag State control inspections
	<ul> <li>marine surveys</li> <li>cargo and handling related inspections</li> <li>marine qualification duties and accreditations and</li> <li>audits of registered training organisations.</li> </ul>
	Promoting a culture of safety in the maritime industry through development of policies, guidelines, and technical requirements (Marine Orders) relating to AMSA's legislative functions, is an integral component of the activity.
	Seafarer and ship safety also includes the development of Australia's maritime regulations and participation in international and regional maritime forums. It involves developing international standards on seafarer and ship safety and environmental protection including harmonisation to international standards (and subsequently national standards), mainly promulgated by the International Maritime Organization (IMO), International Labour Organization, and members of the Tokyo and Indian Ocean Memoranda of Understandings.
Marine services and ship registration (fees for service)	<ul> <li>Provide a range of services for the following categories:</li> <li>services to seafarers and coastal pilots (mainly qualifications), including approvals, issuing permits, authorisations, certifications, and licensing for domestic and internationally recognised marine qualifications</li> <li>inspections and surveys requested by ship owners (or agents)</li> </ul>
	<ul> <li>shipping registration of Australian flagged vessels, including ensuring ships are maintained and crewed to a suitable standard and</li> <li>other services, including determinations and exemptions.</li> </ul>
National System, fee for service (introductory	AMSA has transitioned to become the national regulator of the domestic commercial vessel fleet and seafarers previously regulated by the states and Northern Territory agencies.
services)	The National System for Domestic Commercial Vessels (National System) regulatory charging activities are being delivered progressively. The first stage involved:
	<ul> <li>the early adoption of a limited range of fees for service for the Marine Surveyor Accreditation Scheme</li> <li>assessment of applications requesting exemptions from the National</li> </ul>
	<ul> <li>System and</li> <li>assessment of applications for equivalent means of competency.</li> <li>This stage commenced on 1 September 2016. The introductory services fees are included in this CRIS.</li> </ul>
	The Marine Surveyor Accreditation Scheme is the principle control mechanism to monitor and maintain competency of the network of accredited marine surveyors.

This CRIS does not cover:

- implementation of the full service for National System regulatory charging activities that commenced on 1 July 2018. This includes the main service delivery involving:
  - monitoring compliance with operational standards for the domestic commercial vessel fleet
  - development and implementation of domestic marine safety and environment protection standards
  - monitoring of ship safety and environment protection standards and
  - administering training standards for domestic seafarers and pilots.

These will be funded by a combination of State and Commonwealth funds and fees from industry for specific services. A CRIS for National System activities covered by fees for services was published separately in June 2018.

- funding arrangements of shipping and offshore petroleum industries and the International Oil Pollution Compensation (IOPC) fund<sup>4</sup>
- search and rescue coordination services for maritime and aviation incidents, which are funded by government budget appropriations<sup>5</sup> and
- externally funded programs funded by various government departments for the provision of specific maritime related services and advice and the National System delivery.

#### 1.2.3 Appropriateness of cost recovery activities

It is government policy that when an individual or organisation creates a demand for a government activity, there should generally be a charge for the provision of these activities.

Participants in the commercial shipping industry pay the costs attributable to the provision of navigational infrastructure within Australian waters, environmental marine protection, seafarer and ship safety, and marine services. However the Government funds search and rescue services attributable to obligations to the broader community through budget appropriations.

#### 1.2.4 Stakeholders

The principle stakeholders for regulatory charging activities in this CRIS are:

- ship owners and operators (international and domestic commercial vessel operators and agents)
- seafarers and coastal pilots
- accredited marine surveyors
- registered training organisations
- Commonwealth, State and Northern Territory agencies and
- the Australian community.

<sup>&</sup>lt;sup>4</sup> The *Protection of the Sea (Oil Pollution Compensation Funds) Bill 1992* essentially established the procedure by which entities are required to provide details of oil receipts to the IOPC fund through AMSA - this is not a cost recovery arrangement.

<sup>&</sup>lt;sup>5</sup> The Government reaffirmed its initial policy, upon the establishment of AMSA in 1991, through the Strategic Review of Search and Rescue Service and Pricing study in 2001 that search and rescue activities will remain funded from taxpayer funded budget appropriations.

## 2 Policy and statutory authority to recover

### 2.1 Government policy approval to cost recover regulatory activities

The Explanatory Memorandum to the <u>Australian Maritime Safety Authority Act 1990</u> states the Government's intent that AMSA 'will run its commercial services on a self-funded basis; services which cannot be provided on a self-funded basis (search and rescue coordination services) will be paid by the Commonwealth'.

AMSA recovers costs from participants in the commercial shipping industry in adherence with <u>Public</u> <u>Governance</u>, <u>Performance</u> and <u>Accountability</u> (<u>Charging for Regulatory Activities</u>) <u>Order 2017</u> which refers to the Australian Government Charging Framework and the Cost Recovery Guidelines (CRGs).

### 2.2 Statutory authority to charge

AMSA's regulatory charging activities are authorised by the application of Australian Commonwealth legislative instruments, in particular Part 5, Division 2 of the <u>Australian Maritime Safety Act 1990</u>, which provides for the charging of levies and fees with references to the following Acts:

- Navigation Act 2012
- Marine Navigation Levy Act 1989
- Protection of the Sea (Shipping Levy) Act 1981
- Marine Navigation (Regulatory Functions) Levy Act 1991
- <u>Shipping Registration Act 1981</u>
- <u>Marine Safety (Domestic Commercial Vessel) National Law 2012</u>

## 3 Cost recovery model

### 3.1 Outputs and business processes of the regulatory charging activities

#### 3.1.1 Activity outputs

As described in *Policy background* (Section 1.2.1), the role of AMSA is to deliver on seafarer and ship safety, environmental marine protection, and search and rescue capability. AMSA's broad activity outputs and primary activities are itemised in **Table 2** below, which also notes whether the output is a regulatory charging activity.

Activity output	Primary activities	Regulatory charging?
Community Services Obligation (search and rescue activities)	<ul> <li>Operating AMSA Response Centre, coordinating maritime and aviation search and rescue.</li> <li>Providing two ground stations and Mission Control Centre for the Cospas Sarsat distress beacon detection system.</li> <li>Maintaining maritime distress and safety communications services.</li> <li>Dedicated airborne search and rescue services</li> </ul>	No, excluded from regulatory charging. Funded from government budget appropriations.
Marine Navigation Levy	<ul> <li>Providing and maintaining a national network of marine aids to navigation and navigational systems</li> <li>Intergovernmental and international engagement for Australia's obligations under SOLAS and IALA.</li> </ul>	Yes
Protection of the Sea Levy	<ul> <li>Managing the National Plan.</li> <li>Crisis preparedness to combat environmental emergencies (pollution incidents).</li> <li>Regulating, monitoring, and coordinating maritime casualty management and emergency towage capability.</li> <li>Conducting safety and pollution prevention public awareness and education campaigns.</li> </ul>	Yes
Regulatory Function Levy	<ul> <li>Monitoring compliance with operational standards for ships in Australian waters, under the Navigation Act 2012, to ensure their seaworthiness, safety, and pollution prevention.</li> <li>Participating in the development and implementation of national and international marine safety and environment protection standards.</li> <li>Providing public access to ship safety and environment protection standards and policies.</li> <li>Administering training standards for seafarers and coastal pilots.</li> <li>Conducting safety public awareness and education campaigns.</li> <li>Exercising occupational health and safety inspectorate functions.</li> </ul>	Yes
Marine services and ship	Administering competency and qualifications     of seafarers and coastal pilots.	Yes

Activity output	Primary activities	Regulatory charging?
registration (fee for service)	<ul> <li>Conducting inspections and audits requested by ship owners or agents.</li> <li>Administering Australia's ship registration system.</li> </ul>	
National System, transition	<ul> <li>Developing infrastructure with provision of training, public awareness, and education campaigns in readiness for the National System.</li> </ul>	No. Funded by Government and AMSA's reserves.
National System, fee for service (introductory services)	<ul> <li>Administering, monitoring, and maintaining network of accredited marine surveyors.</li> <li>Assessment of applications requesting exemptions from National System, and equivalent means of competency.</li> </ul>	Yes
National System, levies and fees (full service)	<ul> <li>Monitoring compliance with operational standards for the domestic commercial vessel fleet to ensure their seaworthiness,</li> <li>Participating in the development and implementation of domestic marine safety and environment protection standards.</li> <li>Providing public access to ship safety and environment protection standards and policies.</li> <li>Administering training standards for domestic seafarers and pilots.</li> <li>Conducting a safety public awareness and education campaigns.</li> </ul>	Partly for activities funded by specific fee for service, excluded from this CRIS. A separate CRIS has been published for these activities.
Externally funded programs	• Externally funded programs funded by various government departments for the provision of specific maritime related services and advice, predominantly in relation to search and rescue capabilities and National System delivery.	No, excluded from regulatory charging; funded by various government departments.

The operational targets of these activity outputs are detailed in Annual Performance Statements of AMSA's <u>Annual Report</u> and <u>Corporate Plan</u>, which describes the reportable measurements in achieving AMSA's policy outcomes. A summary is provided in *Non-financial performance* (Section 7B of this CRIS).

#### 3.1.2 Business processes

It is important to note that levy regulatory charging activities relate to the provision of a total function (statutory regulations) as opposed to transactional business processes; the costs for delivering these activities are not on a transactional basis, rather, levy related costs are driven by the support to overall activity outputs.

Fee for service activities are linked to business processes, supporting specific charges to which the fees relate. Generic business processes for fee for service activities include:

- receipt and review of an application, including consultation with an applicant
- undertaking technical assessment of an application, with a decision by a delegate and
- processing and issuing a certificate, license or approval.

In practice, the receipt and review process and issue business procedures is broadly similar across AMSA's fee for service charging activities. However, time and effort (and costs) for technical assessment and decision business process vary between the types of fees and on the complexity and nature of the application.

### 3.2 Costs of the regulatory charging activities

AMSA applies an activity-based costing allocation methodology to determine costs for its activity outputs and regulatory charging activities. This holistic approach incorporates the entirety of AMSA's cost base, in accordance with the Financial Management Information System (FMIS), and allocates these costs to activity outputs based on activity drivers. An illustration of the methodology and approach for the cost recovery model is depicted in **Appendix 1**.

Costs for activities classified as either direct or indirect (overhead) are reviewed on an annual basis to determine operational requirements against expected demand and resulting revenue in order to ascertain efficiencies (or savings) that may be achieved.

We consider our actual expenditure reflects efficient current costs in the context of regulatory charging activities as it operates today and it is an area of continuous monitoring and improvement.

#### 3.2.1 Nature of costs

The nature and make-up of costs vary considerably across AMSA's regulatory charging activities. For example, the provision of aids to navigation has an extensive capital cost component (depreciation and amortisation) with consistently high maintenance costs, reflecting the hostile weather and corrosive environments in which these assets operate.

In contrast, seafarer and ship safety regulations (for both levy and fee for service activity outputs) is labour intensive and as such has a high staff cost component. Activities requiring a large average staffing level (ASL), will have higher overheads allocated in comparison to activities with minimal labour obligations – refer to *Indirect costs* (Section 3.2.3).

#### 3.2.2 Direct costs

Direct costs are those costs directly and clearly attributed to activities based on estimates of resource requirements for the delivery and provision of the statutory and regulatory obligations of AMSA, which include employee costs, suppliers, depreciation and amortisation.

Direct staff costs are allocated to activities based on a detailed analysis of staff utilisation to determine operational requirements in the context of AMSA's statutory obligations. This analysis provides and validates estimated time and effort requirements of staff for each activity.

Direct supplier costs are allocated to activities based on an analysis of the nature of expenditure, validated by management through a detailed activity analysis. Supplier costs include travel and transport costs, materials and services, communication and administrative expenses.

#### 3.2.3 Indirect costs

Indirect costs include costs attributable to staffing for activities such as property, information technology costs and those costs that cannot be directly attributable to an activity such as corporate and executive costs. These costs are:

- (1) Property operating expenditure (POE) the nature of AMSA's policy outcome—the provision of maritime infrastructure in the form of aids to navigation, as well as obligations in maintaining regional offices and stockpile facilities across Australia— corresponds to a sizeable property footprint and associated expenditure. These overhead costs are assigned to direct activities based on work-points and usage requirements of each business unit.
- (2) Information Technology (IT) consists of software licensing and maintenance not directly attributed to activity outputs, as well as an outsourced IT network services. These overheads are allocated to direct activities based on the estimated ASL required to perform those activities.
- (3) Corporate and executive overheads determined with reference to the detailed activity analysis, these costs predominately consist of corporate services (IT staff, communications, human resources, finance, and governance), executive functions and legal support. These overheads are allocated to direct activities based on estimated ASL related to the levies and government funded search and rescue activities<sup>6</sup>.

<sup>&</sup>lt;sup>6</sup> The basis for this treatment is that corporate and executive costs has predominately been funded from the Community Services Obligation (search and rescue) and international shipping levies in the past. Therefore, these costs should continue to be allocated to these activity outputs only. A review of this methodology will be undertaken in the next published CRIS.

#### 3.2.4 Capital costs

Capital costs are represented by depreciation and amortisation, which are used to determine capital expenditure requirements for the replacement and enhancement of AMSA's assets. These costs are either attributable directly to the relevant activity, where there is a direct linkage to the provision of these activities, or on the overhead basis noted in *Direct costs* (Section 3.2.3) (either work-points or ASL dependent on the nature of the asset).

#### 3.2.5 Attribution of costs to non-charging activities

Staff providing regulatory charging activities may also undertake other activities funded by either Australian Government budget appropriations (search and rescue coordination services) or Australian Government agencies for targeted externally funded maritime related programs. The costs for these non-charging activities are identified during the detailed activity analysis process, and overheads allocated to these activities using the same process noted at 3.2.3 above.

#### 3.2.6 Key cost drivers and assumptions underlying the model

The main costs for AMSA's regulatory charging activities is direct supplier and staff costs (~79%) and corporate and executive functions (~21%), this is summarised in **Table 3**.

#### Table 3: Cost categories (%)

Cost category	%
Direct (salaries and suppliers) and attributable costs	79.1%
Corporate and executive functions (includes staff and supplier costs)	20.9%

Accordingly, staff and supplier costs are key cost drivers for AMSA's regulatory charging activities. For staff costs, the driver is the time and effort spent on an activity, whereas for supplier costs it is the contracted service agreements for the aids to navigation and National Plan activities. However, this largely depends on the nature and costs of the activity, as mentioned in *Nature of costs* (Section 3.2.1).

Assumptions underlying the model include:

- no staff vacancies and that any vacant position will be back-filled by a contractor at a similar cost
- no weighting is applied to factor the differential pay grades
- effectively time spent by a manager is treated similarly to a staff member under their supervision and
- capital costs are to be represented by depreciation and amortisation on the assumption that these reasonably reflect the costs associated with required replacement and enhancement of AMSA's assets<sup>7</sup>.

#### 3.2.7 Sensitivity of cost estimates to changes in assumptions

The assumptions underlying the cost recovery model are developed to limit and constrain any significant sensitivity to the cost estimates from changes in cost drivers or demands in regulatory charging activities.

As illustrated in *Key cost drivers and assumptions underlying the model* (Section 3.2.6), costs predominately consist of suppliers and staff. Supplier costs are largely longer-term contracts where expenditure relates to service requirements or deliverables. These are generally not dynamic or responsive to short-term changes in demand of AMSA's regulatory charging activities. Staff costs have a similar constraint for short-term movements of demand, and are based on long-term expected time and effort requirements to meet policy outcome.

In determining the staff and supplier cost levels, AMSA forecasts the expected level of demand for regulatory charging activities as part of its annual budgeting processes. This process is based on historical data and trends, consultation advice, understanding of known economic factors, and thorough communication with its principle stakeholders.

This assumption is to be reviewed for the next cost recovery model development. AMSA is currently working on enhancements to its Capital Management Plan which will enable a comprehensive determination of asset and capital requirements, including maintenance, and any potential shortfalls that may exist in capital funding.

#### 3.2.8 Cost estimates for 2018–19

Estimated costs for providing AMSA's regulatory charging activities, broken down into direct ASL, and direct and overheads costs, are set out in **Table 4** below.

Table 4: Breakdown	of costs estimates	s for 2018–19

Activity output	Direct ASL**	Direct (\$'000)	Overhead (\$'000)	Total (\$'000)
Marine Navigation Levy	21.1	30,494	4,562	35,056
Aids to navigation maintenance and services	11.9	27,573	2,683	30,256
Business, regulations, and legislative support	3.8	726	728	1,454
Vessel traffic services (VTS)	0.2	985	38	1,023
Others*	5.2	1,210	1,113	2,323
Protection of the Sea Levy	28.1	28,017	6,482	34,499
National Plan activities	12.1	22,689	3,136	25,825
Intergovernmental and international liaisons	5.4	1,254	1,136	2,390
Australia's Rescue Coordination Centre response and readiness (pollution, salvage and intervention)	3.0	1,497	696	2,193
Business, regulations, and legislative support	4.6	844	886	1,730
Others*	3.0	1,733	628	2,361
Regulatory Function Levy	88.4	22,059	24,210	46,269
Inspections and surveys	22.3	4,623	7,461	12,084
Services to seafarers and coastal pilots, pilot providers, and manning levels	10.2	1,996	3,426	5,422
Industry consultation and regional engagement	8.8	1,869	2,796	4,665
Consultation, advice, and awareness	9.1	2,468	1,943	4,411
Standards and regulation development	10.7	2,114	2,243	4,357
Provision of terrestrial high frequency radio and satellite communication	1.5	2,784	316	3,100
Compliance and enforcement	6.0	1,069	1,833	2,902
Intergovernmental and international liaisons	4.9	1,160	1,007	2,167
Contract centre – ship operations	5.9	892	1,062	1,954
Business, regulations, and legislative support	3.0	612	574	1,186
Vessel traffic services	0.1	1,070	28	1,098
Others*	5.9	1,402	1,521	2,923
Fees for service	22.9	4,209	1,575	5,784
Services to seafarers and coastal pilots, pilot providers, and manning levels	6.8	1,357	445	1,802
Inspections and surveys	6.3	1,301	417	1,718
Ship registration	3.8	489	298	787
Others*	6.0	1,062	415	1,477
National System, fees for service (introductory services)	1.0	207	58	265
Marine surveyor accreditation, exemptions, and equivalent means of compliance	1.0	207	58	265
Grand Total	161.5	84,986	36,887	121,872

\* Consists of various activities considered minor (eg individual costs <\$1.0 million), except where noted.

\*\* Does not include non-regulatory charging activities or overheads, only direct regulatory charging ASL.

### 3.3 Design of regulatory charges

Regulations of the international and domestic commercial shipping industry is rather complex, with a wide range in the variety of vessel types and handling of various cargoes.

During the period 2013–14 to 2016–17, the quantity of levy liable visits to Australian ports by applicable foreign-flagged and domestic vessels have been relatively consistent (~10,000 per annum). However, the total net registered tonnage volumes have steadily increased, signifying larger vessels are visiting Australian ports.

The majority of vessel types continue to be bulk cargo carriers (~81.8%), with container vessels and liquid product and gas tankers (~11.3%) mainly contributing to the balance. The average number of port visits during each levy payment period (ie three months) varies depending on the vessel type and cargoes, with bulk cargo vessels averaging around one to two visits per levy payment period and container ships around five to six.

These factors mean that any projections of expected growth (or reductions) in demand for regulatory charging activities must consider the complex relationships within the commercial shipping industry.

#### 3.3.1 Charging structure

The design of AMSA's regulatory charging activities considers whether a service is being provided to an individual entity (where costs can be reasonably attributed to that entity) or whether the activity involves a group of entities (provided to commercial shipping industry and the broader community).

AMSA applies a 'user pay' principle for regulatory charging activities. The Marine Navigation Levy and Regulatory Function Levy is charged against vessels that use the national network of integrated aids to navigation and traffic management measures in the Australian waters and are subject to safety regulatory activities. Fee for service activities are performed for, or on the application of, a particular individual or organisation, which receive or use benefits. The Protection of the Sea Levy is charged against vessels that have the potential to be polluters of the marine environment.

AMSA's charging structure is broadly shown in Table 5 below.

Regulatory charging	Method	Structure
Marine Navigation Levy	Levy	Net registered tonnage – sliding scale
Protection of the Sea Levy	Levy	Net registered tonnage – linear
Regulatory Function Levy	Levy	Net registered tonnage – sliding scale
Marine services	Fee for service	Direct (fixed) fee or hourly rate
Ship registration	Fee for service	Direct (fixed) fee or hourly rate
National System (introductory services)	Fee for service	Direct (fixed) fee or hourly rate

#### Table 5: Charging structure

### <u>Levies</u>

The commercial shipping industry pays levies on non-exempted vessels<sup>8</sup> that are twenty-four (24) metres or more in tonnage length, with the rate based on a vessel's net registered tonnage (NRT). The rate of the Marine Navigation Levy (MNL) and Regulatory Function Levy (RFL) is charged on a sliding scale, whereas the Protection of the Sea Levy (PSL) is charged on a linear (or flat) rate for vessels that also carry ten (10) or more tonnes of oil on board<sup>9</sup>.

A summarised Levy Ready Reckoner is shown in **Table 6** below.

#### Table 6: Levy Ready Reckoner\*

	Net Registered Tonnage (NRT)			)
From	0	5,001	20,000	50,000
То	5,000	19,999	49,999	∞
Levies	Cents per NRT	Cents per NRT	Cents per NRT	Cents per NRT
Marine Navigation Levy (MNL)	23.50	12.00	7.00	2.50
Regulatory Function Levy (RFL)	17.00	17.10	17.00	15.50
Marginal rates for MNL and RFL	40.50	29.10 Plus \$2,025	24.00 Plus \$6,390	18.00 Plus \$13,590
Protection of the Sea Levy	11.25	11.25	11.25	11.25
Minimum	\$10	\$10	\$10	\$10

\* Schedule of levy rates are contained in each respective levy legislative instruments.

<sup>&</sup>lt;sup>8</sup> There are a list of exemptions contained in the <u>Marine Navigation Levy Collection Regulations 1990</u>, <u>Marine Navigation (Regulatory functions)</u> Levy Collection Act 1991, and Protection of the Sea (Shipping Levy) Regulation 2014.

<sup>&</sup>lt;sup>9</sup> There will be situations where vessels exempted from the MNL and RFL may be liable for the PSL. Generally, these vessels include fishing, religious charitable, non-for-profit organisation, or research vessels.

AMSA's methodology for the charging structure of levies is derived from historical predecessors, where banding of levy charges on net registered tonnage is considered a common basis for regulatory charging within, and to, the commercial shipping industry. Levy rates within these traditional net tonnage bands have been adjusted periodically.

International vessels are liable for levies on either the day of arrival to an Australian port, or where the vessel remains in Australia and not paid the corresponding levies in the previous three months, the day after the end of that period. With Australian coastal trading vessels, unless the vessel is out-of-service, levies are payable at the start of each quarter.

### Fee for service

The fee for service activities comprise applications or assessments, inspections, registrations, and accreditations. This is predominately based on determined average time and effort requirements, and associated hourly rates of labour and overheads costs.

AMSA's fees are generally broken into the following broad categories:

- services to seafarers and coastal pilots (mainly qualifications), including approvals, issuing permits, authorisations, certifications, and licensing for both domestic and internationally recognised marine qualifications
- inspections and surveys requested by ship owners (or agents)
- shipping registration of Australian Flagged Vessels, including ensuring ships are maintained and crewed to a suitable standard
- other services relating to international shipping, including determinations and exemptions and
- National System introductory services fees, including application of marine surveyors, assessment of application for specific exemptions and assessment for equivalent means of compliance.

Fixed fees are applied to those regulatory activities where the range of typical delivery times do not vary significantly from the standard average time. Where there are wide variations, indicated by significant deviations from the standard time, the relevant charge is based on an hourly rate, plus any reasonable unavoidable travel costs. These travel costs may be flights and accommodation, where services are provided at locations remote from AMSA regional offices<sup>10</sup>, or motor vehicle travel rates where vehicles are used for the mode of transport to and from offices<sup>11</sup>.

For 2018–19, the hourly rate will remain at \$272, with the National System introductory services hourly rate increasing to \$238 (from \$234) in accordance with indexation.

The current schedule of the fees for service regulatory charging activities are included in **Appendix 2**. Charging rates are also published in <u>AMSA's website</u>.

#### 3.3.2 Revenue estimates

Estimated revenue for the budget (2018–19) and 2019–20 is summarised in Table 7.

Activity outputs	2018–19 (\$'000)	2019–20 (\$'000)			
Levy					
Marine Navigation Levy	35,282	35,811			
Protection of the Sea Levy	35,421	35,952			
Marine Navigation (Regulatory Function) Levy	53,157	53,955			
Total levy estimates	123,860	125,718			
Fee for service					
Services to seafarers and coastal pilots	1,035	1,060			
Inspections and surveys	1,552	1,589			
Shipping registration	718	736			
National System (introductory services)	200	205			
Total fee for service estimates	3,505	3,590			

#### Table 7: Revenue estimates

<sup>0</sup> Given the various locations of AMSA offices, these costs will generally be limited.

<sup>10</sup> Defined as more than twenty-five (25) kilometres from an AMSA office, the charge is based on a per kilometre based specified by the Australian Taxation Office business use rates.

Activity outputs	2018–19 (\$'000)	2019–20 (\$'000)
Total regulatory charging estimates	127,366	129,308
Interest and other revenue		
Interest	2,000	2,048
Other revenue	847	847
Total interest and other revenue	2,847	2,895
	•	
Total revenue estimates	130,213	132,203

Levy and fee for service revenues have only been projected until 2019–20 since it is not possible to comment on the future years without factoring the review of AMSA's operating model for the National System, which is to be undertaken in the 2020–21 budget development.

Regulatory charging activity estimate volumes are determined with reference to actual and historical results, with an application of growth rates sourced from independent resources with detailed analysis and inputs from management.

## 4 Risk assessment

AMSA has implemented internal controls to ensure that costs recovered for regulatory charging activities are measured correctly and collected on time. In adherence with legislative obligations, an officer of Customs may detain a vessel at any Australian port for unpaid and outstanding levies, released only after payment is received. This process ensures that the existence of any unpaid levies are consistently at a very low level.

An assessment of regulatory charging activities was conducted using the Department of Finance's Charging Risk Assessment. AMSA considers the risk to remain low given that there are no anticipated changes to current activities. The new charges applicable from 2018–19 are only those commencing under the National System and these are covered under a separate CRIS, which is rated independently against the CRA.

An examination of the risks with its regulatory charging activities, accompanying mitigation strategies are detailed in **Table 8** below, with additional details provided in <u>AMSA's Corporate Plan</u>.

Risk identified	Mitigation strategy
Economic factors that may affect the quantity of arriving international commercial vessels	To avoid constant changes in levy rates, AMSA has previously implemented a range of efficiency saving measures to offset any potential reductions in levy revenue, while maintaining the rates at their current levels.
Failure as a regulator to prevent an incident or fatality in relation to compliance and enforcement arrangements	Continue to review measures to minimise the risks of shipping and pollution incidents and maximise safety of people involved. This includes ensuring ship inspection programs navigational services and safety and regulatory targets are being met, whilst implementing and applying lessons learnt.
Pollution incident response clean-up costs exceed AMSA's reserves; financial and reputational damage to AMSA.	AMSA has implemented a Pollution Response Reserve to fund any potential clean-up costs from a major environmental emergency; with the possibility to drawdown for a special appropriation should an extreme pollution incident occur.
Escalating costs to provide regulatory activities to principle stakeholders beyond efficient costs	AMSA forecasts expected level of demand for regulatory charging activities as part of its annual budgeting exercise, with comparisons to both domestic and international regulatory bodies that provide similar charging activities.
	Activities and business processes for regulatory charging are constantly being monitored to adjust with service deliverables and to identify potential efficiencies, such as information technological changes, that may be implemented to reduce or, at the very least, maintain current costs.
Capital funding shortfalls for the replacement and maintenance of aids of navigation and information technology infrastructure systems	AMSA reviews its capital assets periodically and is currently strengthening the asset management framework by developing a long term Capital Management Plan, which will enable a comprehensive determination of asset and capital requirements, including maintenance timing, and any potential shortfalls that may exist in capital funding in forward years.

Table 8: Risks and mitigation strategies associated with regulatory charging

### 5 Stakeholder engagement

Consultation and communication with AMSA's stakeholders is an essential component of developing and maintaining an effective and transparent CRIS. AMSA provides industry stakeholders with regular updates on its regulatory charging activities, including:

- the provision of charging rates published on AMSA's website
- developing and publishing in CRISs
- development of budgets in Portfolio Budget Statements and
- reporting cost recovery regulatory charging in Annual Reports in accordance with Finance Minister's Orders.

Ensuring transparency and accountability of its cost recovery arrangements, we are in regular consultation on the management of charges with the relevant principle stakeholders identified in *Stakeholders* (Section 1.2.4), through consultative forums, including the AMSA Advisory Committee, which represents the commercial shipping industry.

In this CRIS, AMSA is not proposing any change to regulatory charging rates, other than legislative indexation movements for National System introductory services fees.

## 6 Financial estimates

**Table 9** outlines the financial estimates that AMSA is currently expecting to achieve for regulatory charging activities for the budget and three forward years.

	2018–19	2019–20
	(\$'000)	(\$'000)
Expenses (X)	121,869	122,821
Revenue (Y)	127,366	129,308
Balance (Y - X)	5,497	6,487
Cumulative balance	5,497	11,984
Cumulative balance from 2013–14 - b/f: \$30,311	35,808	42,295

As at 30 June 2019, AMSA expects the cumulated balance for regulatory charging activities from 2013– 14 to 2018–19 will be \$35.8 million. Of this amount \$19.9 million relates to the balance of the Protection of the Sea Levy, which has been set aside to fund AMSA's Pollution Response Reserve, a fund based reserve to be used for major pollution responses (environmental emergencies) that may not be recoverable from the polluter or insurance agencies.

The balance amount of \$15.9 million is used to part fund the development and implementation of a modern regulatory framework applicable for both international and domestic commercial vessels.

As noted earlier, the charging analysis has only been projected until 2019–20, since it is not possible to comment on the future years without factoring the review of AMSA's operating model for the National System, to be undertaken during the 2020–21 budget development.

Table 10 outlines the historical financial performance of AMSA's regulatory charging activities.

•		•	, , ,		
	2013–14 (\$'000)	2014–15 (\$'000)	2015–16 (\$'000)	2016–17 (\$'000)	2017–18 (\$'000)
Expenses (X)	113,449	120,384	120,955	120,957	112,779
Revenue (Y)*	121,032	115,589	125,929	127,059	129,226
Balance (Y - X)	7,583	(4,795)	4,974	6,102	16,447
Cumulative	7,583	2,788	7,762	13,864	30,311

 Table 10: Historical performance of AMSA's regulatory charging activities

\* Revenue includes insurance recoveries for pollution incidents, and other revenue, as expenditure associated with these activities have been included. This differs to the treatment in previously published CRISs that disclosed the regulatory charging revenue for levies and fees only.

## 7B Non-financial performance

Summarised performance targets for regulatory charging activities are provided in **Table 11** below, with specific details contained in <u>AMSA's Corporate Plan</u>.

Table	11:	Performance	targets
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Activity output	Performance target
Marine Navigation Levy	Marine aids to navigation network's availability complies with the targets set out by the International Association of Marine Aids to Navigation and Lighthouse Authorities: 100%.
	Regulatory measures introduced consistent with international effect dates: 100%.
Protection of the Sea Levy	There is a reduction over time in the ratio of reports to AMSA for serious pollution incidents compared to the total number of ship port visits to Australia: <0.7%.
Regulatory Function Levy	Inspection rate of risk assessed eligible foreign-flagged ships under PSC program meets the following targets: priority one vessels: 80%; priority two vessels: 60%; priority three vessels: 40%; priority four vessels: 20% <sup>12</sup> .
	Extent to which inspections of high-risk ships conducted within specified timeframes: 100%.
	Annual number of PSC and flag State control (FSC) inspections meet the following targets: all inspections: 7,900; PSC inspections: 3,000; and FSC inspections: 60.
	Improvement in the standard of foreign-flagged ships and Australian-flagged ships (under the <i>Navigation Act 2012</i> ) operating in Australian waters: average number of deficiencies per inspection: <3.25%; percentage of ships detained through PSC: <7.5%; proportion of serious incidents to port state visits: <0.5%; and age of ships: ≤average age of worldwide fleet.
	For seafarer competency and welfare, improvements in the standard of foreign-flagged ships and Australian-flagged ships (under the <i>Navigation Act 2012</i> ) operating in Australian waters: average number of Maritime Labour Convention (MLC) deficiencies per inspection: <0.5%; and onshore complaints made under MLC investigated with specified timeframes: 100%.

AMSA has consistently achieved the majority of its performance targets. The results are measured and reported in the <u>Annual Report</u> and <u>Portfolio Budget Statements</u>.

<sup>&</sup>lt;sup>12</sup> Priority refers to a risk profile, with priority one vessels high risk and priority four vessels as low risk. This risk-based approach is a preventative measure to ensure that AMSA focuses resources on those vessels that pose the greatest threat to safety and the marine environment. For example, passenger vessels have a predominately higher risk than cargo vessels.

## 8 Key forward dates and events

Indicative dates for the updating of the next CRIS are disclosed in **Table 12** below.

Event	Description	Indicative date
2019–20 CRIS	Commence development of cost recovery model, including a stakeholder engagement strategy	February 2019
Present model, consultative CRIS to AMSA's Executive and Board		March 2019
Engage with stakeholders, including Portfolio Departme and Department of Finance		April 2019
	Update model with budget for 2019–20 and actual results for 2018–19, obtaining Portfolio approval	July 2019
	Upload 2019–20 CRIS onto AMSA's website	August 2019

Table 12: Indicative events and forward dates

## 9 CRIS approval and change register

A CRIS approval and change register is provided in **Table 13** below. This will be updated once the CRIS is approved and published.

Date of change	CRIS change	Approval	Basis for change
15 Sep 2016	Agreement to the CRIS	Minister for Infrastructure and Regional Development	Initial release
23 Sep 2016	Publication of CRIS	Chief Executive Officer	Initial release
29 Jun 2017	Update with financial results	Chief Executive Officer	Update with budget (2016– 17) and actual results (2015–16), and incorporate National System, fee for service (introductory services)
21 Dec 2018	Update with financial results	Chief Executive Officer	Update with budget (2018– 19) and actual results (2017–18) and publish CRIS on AMSA's website

### Table 13: CRIS approval and change register

## Appendix 1: Methodology and approach for cost recovery model

Activity based costing methodology applied in AMSA's cost recovery model

Costs	Activities	Services	Unit Cost
- Staff & Suppliers - Depreciation - Central costs	<ul> <li>Direct costs</li> <li>Divisional support</li> <li>Corporate support</li> <li>Executive functions</li> </ul>	- Community Services - National System - Levies & fees - Externally funded	- Volumetric data - Estimated time - Unit cost

Australian Maritime Safety Authority Cost Recovery Implementation Statement for 2018–19 AMSA1066

## Appendix 2: Schedule of fee for service charges

Current schedule of the fee for service regualtory charging activities are listed below, with references to <u>AMSA's Fees</u> <u>Determination 2015</u> and <u>Marine Safety (Domestic Commercial Vessel) National Regulation 2013</u>.

Services to seafarers and coastal pilots           Services to pilotage providers           Processing application for licence as provider of coastal pilotage services or for reinstatement of licence as provider of coastal pilotage services           Scheduled compliance audit of accredited provider of coastal pilotage services	Hourly rate	\$272	
Processing application for licence as provider of coastal pilotage services or for reinstatement of licence as provider of coastal pilotage services Scheduled compliance audit of accredited provider of coastal pilotage		\$272	
services or for reinstatement of licence as provider of coastal pilotage services Scheduled compliance audit of accredited provider of coastal pilotage		\$272	
Scheduled compliance audit of accredited provider of coastal pilotage			\$272
	Hourly rate	\$272	\$272
Examinations and assessments			
Assessment of sea service for an:	Fixed fee	\$168	\$168
<ul> <li>(a) AMSA certificate of competency as master, deck office, or engineer; or</li> </ul>	T IXEU IEE		·
(b) AMSA certificate of recognition of a certificate of competency as master, desk office, or engineer.			
Oral examination for certificate of competency - STCW 78 unlimited	Fixed fee	\$544	\$544
Computer based examination for certificate of competency	Fixed fee	\$220	\$220
Assessment of marine qualifications for immigration purposes	Fixed fee	\$472	\$472
Undertaking a psychometric assessment	Variable fee	Cost of	
	Variable lee	prov	
Certificates for seafarers and pilots			
Processing application for initial issue of certificate of competency or proficiency	Fixed fee	\$190	\$190
Processing application for initial issue of certificate of recognition or competency or proficiency or certificate of equivalence	Fixed fee	\$190	\$19
Processing application for revalidation of certificate of competency o certificate of recognition or proficiency or certificate of equivalence	Fixed fee	\$136	\$13
Processing of application for endorsements to active certificate of competency	Fixed fee	\$112	\$11
Processing of application of initial issue of, or revalidation of, Global Maritime Distress and Safety System (GMDSS) competency certificate or certificate of recognition of GMDSS certificate	Fixed fee	\$112	\$112
Processing of application for issue of initial coastal pilot's licence of reissue of coastal pilot's licence	Fixed fee	\$150	\$15
Written examination of theory or charts for coastal pilot's licence— standard examination	Fixed fee	\$544	\$54·
Written examinations of charts for coastal pilot's licence— Whitsundays	Fixed fee	\$816	\$81
Oral examination for check pilot licence	Fixed fee	\$816	\$810
Processing application for issue of compass adjuster licence	Fixed fee	\$190	\$190
Processing application for issue of certificate of safety training	Fixed fee	\$112	\$11
Processing application for issue of certificate of proficiency as Marine Cook	Fixed fee	\$112	\$112
Additional charge for transmission of documents other than by regular mail, such as fax, email, or registered mail:	Fixed fee		
(a) within Australia (b) outside Australia		\$40 \$80	\$4 \$8
Services to registered training organisations			
Processing application by training organisation for approval of training course	Hourly rate	\$272	\$272
Schedule periodic compliance audit of approved courses provided by registered training organisation	Hourly rate	\$272	\$272
Services to providers of vessel traffic services	1	L	
Processing application for authorisation to provide vessel traffic services	Hourly rate	\$272	\$272
Conduct scheduled periodic compliance audit of provider of authorised vessel traffic services Inspections and surveys	Hourly rate	\$272	\$272

Charge	Туре	2017–18 Rate	2018–19 Rate
Vessel design and performance—tonnage measurements and loadline			
Provision of copies of tonnage calculations	Hourly rate	\$272	\$272
Inspections and certification for tonnage measures and loadline	Hourly rate	\$272	\$272
Inspections of vessels and equipment	· · · · ·		
Approvals and exemptions for a vessels, materials handling equipment	Hourly rate	\$272	\$272
or loading or unloading arrangements for a vessel, and, for second and			
subsequent visits, inspections of vessels, equipment, or arrangements			
for these matters		<b>\$070</b>	<b></b>
Survey for initial issue or reissue of a certificate	Hourly rate	\$272	\$272
Follow-up visits to re-inspect deficiencies identified at initial inspections	Hourly rate Hourly rate	\$272 \$272	<u>\$272</u> \$272
Other services and inspections of vessels and equipment Visits to vessels or loading facilities for inspections to ensure safe	Hourly rate	\$272	\$272 \$272
loading and stowage of grain	Tiouriy rate	φ212	φ212
Inspections, determinations, approvals, and exemptions for solid bulk	Hourly rate	\$272	\$272
cargoes	Tiouriy fate	ψ212	<i>ψΖΙΖ</i>
Inspections, determinations, approvals, and exemptions for dangerous	Hourly rate	\$272	\$272
goods	riourly rate	Ψ212	$\psi Z T Z$
Inspections, certifications, approvals, and exemptions for transportation	Hourly rate	\$272	\$272
of livestock, including inspections and services for issue or endorsement	i loury rato	Ψ212	Ψ212
of an Australian Certification for the Carriage of Livestock			
Inspections and approvals of containers for authorisations to load or	Hourly rate	\$272	\$272
unload where container is unsafe or overloaded or lacking a valid safety	, <b>,</b>	· · · · ·	+
certificate plate or after expiry of the examination date			
Miscellaneous inspections that are compulsory, requested by the	Hourly rate	\$272	\$272
recipient, or follow-up inspections to confirm corrective action			
Determinations, declarations, exemptions and approvals			
Processing application for determination (other than a manning level	Hourly rate	\$272	\$272
determination), declaration, exemptions, or approval under Navigation			
Act 2012			
Processing application for exemption of vessel from coastal pilotage	Hourly rate	\$272	\$272
requirements			
Processing application for exemption of seafarer from coastal pilotage	Fixed rate	\$136	\$136
requirements for exempt vessel			
Services relating to manning levels		· · · · · · · · · · · · · · · · · · ·	
Processing application for determination of manning levels	Fixed rate	\$1,088	\$1,088
Processing application for review of existing approved manning levels	Fixed rate	\$544	\$544
Services relating to the international safety management code			
Processing application for document of compliance or safety	Hourly rate	\$272	\$272
management certificate, including conduct of initial audit or for			
reinstatement of document or certificate			
Scheduled periodic compliance audit relating to continuation of	Hourly rate	\$272	\$272
document of compliance or safety management certificate			
Shipping registration			
Applications for registration or re-registration		h	#0.00 ·
Processing application for registration of ship required to be registered	Fixed fee	\$2,664	\$2,664
by the Shipping Registration Act 1981		<b>*</b> •••••	<b>*</b> •••••
Processing application for registration of ship, other than Australian	Fixed fee	\$3,996	\$3,996
owned ship, on demise charter to an Australian based operator		<b>*</b> • <b>- -</b> • •	<u> </u>
Processing application for registration of ship permitted to be registered	Fixed fee	\$1,554	\$1,554
by <i>Shipping Registration Act 1981</i> , other than foreign owned ship on			
demise charter to an Australian based operator			
Transfer or transmission of ownership	<b>Fixed fee</b>	<b>Ф777</b>	<b> <b> <b> <b> </b> </b></b></b>
	Fixed fee	\$///	\$777
	Eived fee	¢1 222	ሮብ ኃጋሳ
	Fixed lee	\$1,332	\$1,332
	Eived fee	¢ / / /	¢111
	Fixed lee	\$444	\$444
<ul> <li>Processing documents for registration of transfer, transmission of ownership, for ship required by <i>Shipping Registration Act 1981</i> to be registered</li> <li>Processing documents for registration of transfer, transmission of ownership, for ship on demise charter to Australian based operator other than an Australian owned ship</li> <li>Processing documents for registration of transfer, transmission of ownership, for ship permitted by <i>Shipping Registration Act 1981</i> to be registered, other than foreign owned ship on demise charter to an Australian based operator</li> </ul>	Fixed fee Fixed fee Fixed fee	\$777 \$1,332 \$444	\$

Charge	Туре	2017–18 Rate	2018–19 Rate
Grant of certificate	÷		
Processing application for grant of provisional registration certificate or new registered certificate under Section 21 of <i>Shipping Registration Act</i> 1981	Fixed fee	\$222	\$222
Processing application for grant or provisional registration certificate under Section 22 or 22A of <i>Shipping Registration Act 1981</i>	Fixed fee	\$333	\$333
Processing application for extension of period of currency of provisional certificate	Fixed fee	\$222	\$222
Processing application for grant of temporary pass	Fixed fee	\$333	\$333
Processing application for grant of certificate of entitlement to fly Australian national flag or red ensign	Fixed fee	\$222	\$222
Supply deletion certificate	Fixed fee	\$111	\$111
Administrative services			
Processing application for exemption from registration	Fixed fee	\$666	\$666
Processing request for change of name of registered ship	Fixed fee	\$111	\$111
Processing request for change of home port of registered ship	Fixed fee	\$111	\$111
Processing request for extension of time for lodging documents	Fixed fee	\$167	\$167
Additional charge for transmission of documents other than by regular mail, such as fax, email, or registered mail:	Fixed fee		
(a) within Australia		\$40	\$40
(b) outside Australia		\$80	\$80
Inspections and searches			
Search by staff of Australian Shipping Registration Office of register— for each period of 15 minutes or remaining part	Fixed fee	\$55.50	\$55.50
Supply of certified extract of Register or of document forming part of or associated with Register	Fixed fee	\$75	\$75
Supply of certified copy of Register entry	Fixed fee	\$40	\$40
Supply of certified copy of documents forming part of or associate with Register—for each page	Fixed fee	\$21	\$21
Caveats	<u>.</u>		
Processing of the lodgement of a caveat	Fixed fee	\$222	\$222
Services relating to a continuous synopsis record	-		
Application for continuous synopsis record	Fixed fee	\$555	\$555
Reissue of continuous synopsis record	Fixed fee	\$170	\$170
Amendments to continuous synopsis record	Fixed fee	\$390	\$390
National System (introductory services)*	1	Г Г Г	
Accreditation application fees			<u> </u>
1 to 5 categories of surveying	Fixed fee	\$1,419	\$1,445
6 to 10 categories of surveying	Fixed fee	\$2,175	\$2,216
11 to 16 categories of surveying	Fixed fee	\$2,931	\$2,986
Renewal accreditation fees		<b>*</b> 0.50	
Renew of marine surveyor's accreditation	Fixed fee	\$259	\$263
Fees for other services Assessing an application for an exemption under Section 143 of the National Law, from the application, or specified provisions of the	Hourly rate	\$234	\$238
National Law Assessing an application for an approval under a Marine Order or an equivalent means of compliance	Hourly rate	\$234	\$238
Other items			****
Other services not listed elsewhere	Hourly rate	\$272	\$272

\* National System introductory services fees are subject to annual indexation.