



Marine Order 503 (Certificates of survey – national law) - Consultation feedback report

Consultation period: 23 February 2026 to 20 April 2026

This report published: September 2026

Proposed commencement date of 1 December 2026.

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Background

Marine Order 503 (Certificates of survey – national law) 2018 (MO503) outlines certificate of survey requirements for domestic commercial vessels (DCVs). These requirements help ensure that commercial vessels operating in Australia are safe and seaworthy.

As part of AMSA's ongoing review of the survey framework, we asked for feedback on some proposed changes to MO503. Most of these changes are administrative. They aim to:

- improve clarity
- reduce red tape in some areas, and
- make the marine order more practical, and easier to use.

We have also identified ways to better support new and emerging vessel technologies. This includes changes to clarify how we treat 'novel vessels' under the survey framework.

Consultation activities

External consultation for Marine Order 503 was open from 23 February 2026 and closed 20 April 2026. AMSA published the draft marine order and a summary of the proposed changes on the AMSA website. An [archived version](#) of the consultation materials is available for reference. Stakeholders were encouraged to provide a submission through the online submission form, via email or by contacting AMSA Connect.

The consultation was promoted through a news article posted on the AMSA website, a news article in the Survey Matters newsletter and through the February 2026 edition of the 'AMSA update' newsletter. A targeted direct email was sent to over 9,300 known DCV contacts. Feedback to the consultation was also encouraged through AMSA's social media channels including Facebook and LinkedIn.

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

Overview of submissions

AMSA received 31 submissions from stakeholders across the DCV sector, including recognised organisations (ROs), accredited marine surveyors (AMSs), vessel owners and operators, seafarers, industry peak bodies and government agencies. Overall, stakeholders were supportive of most of the proposed reforms and welcomed efforts to improve the survey framework. Submissions also raised a range of comments and suggestions on specific proposals, reflecting the diverse interests and experiences of different parts of the sector. Around one-third of submissions focused on proposed changes relating to novel vessels, while the remaining submissions addressed a variety of matters relating to conventional vessels. Specific detail is provided for each proposal below.



Key themes

Clarifying and updating the requirements for novel vessels

What AMSA proposed

This proposed change is intended to update and clarify the requirements for novel vessels. This will provide greater certainty to novel vessel operators and implement new ways to manage novel technologies.

Specifically, we proposed that ROs be permitted to develop and apply technical specifications for novel vessels. ROs would survey novel vessels according to these specifications and the applicable standards. Novel vessels under 35 metres would not be required to obtain a certificate of classification.

This proposed change:

- clarifies the criteria for determining when a vessel is novel
- requires ROs to develop and apply technical specifications for a novel vessel
- clarifies the survey requirements for novel vessels, including survey frequency.

This approach establishes performance-based outcomes for owners of novel vessels by providing flexibility in the way ROs assure the safety of novel vessels, and controlling the unique risks associated with emerging technologies.

Feedback

Feedback was broadly supportive of the proposed changes, highlighting the benefits of the improved and clarified requirements for novel vessels. Respondents also supported the performance-based outcomes approach for novel vessel technical specifications, with one commenting that it was a critical step to enabling innovation within the DCV fleet.

Some stakeholders expressed concerns about the appropriateness of the proposed requirements for lower-risk uses of novel technologies. For example, some submissions questioned the extent of RO involvement and whether RO assurance was necessary or appropriate for certain novel vessel technologies. Concerns were also raised about the potential cost and administrative implications associated with requiring RO assurance.

There were also requests for more detail about what types of technology may be determined to be novel, how ROs would develop technical specifications and how these requirements would operate in practice.

Several submissions queried whether vessel length is an appropriate consideration for determining regulatory requirements and suggested that other factors may be more relevant.

Another theme raised by multiple responses was how novel technologies could move to become routine with formal standards and how to support AMSs to gain competencies in surveying these technologies.



During consultation, a number of stakeholders expressed support for earlier implementation of the proposed novel vessel framework, noting the importance of addressing emerging vessel types as a priority.

Response

Existing standards, such as the National Standard for Commercial Vessels (NSCV), were not developed to account for the types of technologies we are now encountering, and these standards by themselves, may not be sufficient to address the risks associated with these technologies. To address this, AMSA is developing a technology-agnostic, risk and performance-based Novel Vessel Framework to enable the safe adoption of emerging technology in the DCV fleet.

The framework draws on AMSA's regulatory experience, stakeholder feedback and lessons from other maritime safety administrations.

While the proposed changes to Marine Order 503 do not, in themselves, constitute significant reform, they are essential for establishing the regulatory mechanisms necessary to support implementation of this broader framework.

To support the safe deployment and operation of novel vessels, AMSA will continue to draw on the expertise of ROs where there is elevated risk arising from the vessel's intended operation. ROs play an important role in providing independent maritime technical assurance, including capabilities to develop standards and technical specifications, informed by global fleet experience, where established standards do not exist, or do not adequately address the risks posed by a novel technology. ROs will continue to assure the safety of some novel vessels. This will be through the application of RO standards and survey, or where necessary, the development of technical specifications to supplement the standards that apply to those vessels.

However, the Novel Vessel Framework will also enable flexibility in our regulatory approach. In addition to the proposed changes in MO503, the Novel Vessel Framework will establish risk-based pathways to exempt specific lower-risk applications of novel technologies from the requirement to be surveyed by an RO, where the risk profile is well understood.

We acknowledge the feedback from industry seeking greater clarity around how the proposed requirements will work in practice. To support the commencement of MO503, AMSA will release the Novel Vessel Framework, a new general exemption and a novel vessel determination, which will identify the types of technology determined to be novel.

AMSA also intends to establish an emerging technology community of practice to support implementation of the Novel Vessel Framework and help build shared knowledge, experience and capability in relation to novel vessel technologies. An expression of interest process is expected to commence later this year.

Longer-term plans to develop standards for novel vessel technologies as they mature and industry uptake increases will continue to be published in AMSA's annual regulatory programs.

In response to stakeholder feedback on the timeliness of these reforms, AMSA has brought forward the commencement date of MO503 from 1 February 2027 to 1 December 2026. This change reflects stakeholder views on the need for timely regulatory action on novel vessels while still providing sufficient time for industry awareness and implementation activities.



Allow a new vessel that is less than 35m in length to meet the construction, engineering or anchoring standards in either the NSCV or class rules

What AMSA proposed

Change to existing requirements: Allow a new vessel that is less than 35m in length to meet the construction, engineering or anchoring standards in either the NSCV or class rules.

Applies to: New vessels under 35m in length.

We proposed that new vessels less than 35m can choose to comply with either the construction, engineering or anchoring standards in the NSCV or class rules if design approval was completed by an RO.

Feedback

Feedback was generally supportive of this proposal, noting that it would provide greater flexibility in the standards available for vessel design. One stakeholder questioned limiting the proposal to vessels with design approval completed by an RO, noting that AMSs currently undertake design approvals against class rules in some circumstances.

Response

AMSA intends to proceed with this change as the proposal provides greater clarity on the standards that may be used for vessel design. This provides a proportionate regulatory approach while maintaining safety assurance arrangements. Guidance material will be developed to clarify how class rules and NSCV requirements interact and the survey pathways available under the framework.

Include the use of Clause 3.12 of USL Code 5F (1989) for transitional vessels

What AMSA proposed

Change to existing requirements: Include the use of Clause 3.12 of the Uniform Shipping Laws (USL) Code 5F (1989) for transitional vessels.

Applies to: Transitional vessels.

We proposed to change the transitional standards for arrangement, accommodation and personal safety to include the use of Clause 3.12 of USL Code 5F (1989). This change would include escape provisions that are not covered in the NSCV Part C1.



Feedback

Feedback was generally supportive of this proposal, including support for measures that improve emergency escape arrangements. Some stakeholders raised concerns that compliance with the escape provisions may be difficult for certain existing vessels where escape hatches, stairwells and other escape arrangements form an integral part of the vessel's design and structure. Stakeholders noted that structural modifications may be costly and difficult to implement.

Response

AMSA intends to proceed with the change as this amendment fixes an unintended gap in MO503 and ensures the requirements for transitional vessels are applied as intended. AMSA expects the practical impact to be limited. Most transitional vessels will be unaffected because they are either too small to require modification or were originally constructed to USL Code standards and already meet the relevant requirements.

Require new vessels to meet the watertight and weathertight integrity standards in the NSCV Part C2.

What AMSA proposed

Change to existing requirements: Require new vessels to meet the watertight and weathertight integrity standards in the NSCV Part C2.

Applies to: New vessels that are entering service for the first time, or new vessels that have made a Schedule 1 change that affects watertight and weathertight integrity.

We proposed to make it mandatory for applicable vessels to comply with the NSCV Part C2 for watertight and weathertight integrity standards. Currently, new vessels can meet either the NSCV Part C2 or the USL Code.

Feedback

Feedback was generally supportive of this proposal. One stakeholder also sought clarification regarding the application of new or updated standards to vessels under construction and the circumstances in which existing standards may continue to apply.

Response

AMSA intends to proceed with this change as the amendment will improve clarity and consistency by adopting the current NSCV Part C2 standards for watertight and weathertight integrity and removing reliance on older standards contained in the USL Code. Guidance material will be developed to provide greater clarity regarding the application of these standards.

Clarify 'sister vessel' arrangements

What AMSA proposed

Change to existing requirements: Clarify 'sister vessel' arrangements.



Applies to: Sister vessels.

A sister vessel is a vessel built to the same design as another vessel. These vessels can use the original vessel's plan approval for a certificate of survey application instead of having to apply for a full plan approval. This makes it easier to obtain a certificate of survey for a sister vessel.

We proposed that the definition of sister vessel be clarified to better explain when vessels may access this arrangement.

Feedback

Feedback was generally supportive of this proposal. One submission sought greater clarity regarding how the provision would operate in particular circumstances.

Response

AMSA intends to proceed with this change as it provides greater clarity regarding the operation of sister vessel arrangements and improves consistency in their application. While some aspects of the arrangements are currently reflected in the Surveyor Accreditation Guidance Manual, incorporating them into Marine Order 503 will provide greater certainty and improve accessibility for stakeholders.

Clarify the Schedule 1 vessel changes

What AMSA proposed

Change to existing requirements: Clarify the Schedule 1 vessel changes.

Applies to: Vessels with a Schedule 1 change.

We proposed a clarification to the Schedule 1 changes that apply to vessels. This included clarifying that the following scenarios are Schedule 1 changes:

- any change or addition of a service category that has not been permitted in the last 5 years, except for decreases in operational area only (e.g. from 3C to 3D)
- a vessel carries a class of dangerous goods that it has not previously been permitted to carry
- a vessel commences overnight operations with berths in use (instead of berths being merely present), or the voyage is more than 36 hours without access to a shore-based sleeping facility, or where the NSCV Part C1 applies, there is an increase in accommodation levels
- the maximum number of people on board the vessel exceeds a previous certificate of survey limit for the vessel within the last 5 years
- an increase in the windage profile of the vessel that invalidates information used in the design approval
- removing, repositioning, installing or modifying certain listed equipment, including stern gear, that invalidates previous structural or stability design approval calculations or assumptions.



Feedback

Feedback was generally supportive of the proposed clarifications, with one stakeholder noting that the changes improve regulatory certainty. Stakeholders also sought greater clarity about how the provisions apply to changes to vessel class, service category, operational area and vessel systems.

Response

AMSA intends to proceed with the proposed clarifications. The amendments are intended to improve certainty and consistency regarding when a Schedule 1 change occurs and what survey requirements apply. AMSA acknowledges stakeholder requests for greater clarity regarding how Schedule 1 changes apply to vessel class, service category, operational area and vessel system changes. AMSA will develop guidance material to assist vessel owners, operators and surveyors in understanding the operation of the provisions.

Allow new vessels under 35m with a Schedule 1 change to comply only with updated standards for the affected area

What AMSA proposed

Change to existing requirements: Allow a new vessel that is less than 35m in length to only comply with updated standards for an area of the vessel affected by a Schedule 1 change.

Applies to: New vessels under 35m in length.

We proposed that new vessels less than 35m in length that have had a Schedule 1 change would only need to meet the updated NSCV or class rules standards for the area of the vessel affected by the change. For example, installing a new refrigeration system would require a vessel to comply with updated NSCV standards for the system, but not require unrelated parts of the vessel to be brought up to current standards.

Feedback

Feedback was supportive of this proposal. Stakeholders described the changes as sensible clarifications that improve safety outcomes and regulatory certainty. One stakeholder noted that it could reduce unnecessary compliance costs by avoiding the need to upgrade parts of a vessel unrelated to the modification being undertaken. One stakeholder sought greater clarity regarding the meaning of 'affected area' and how the proposal would operate in practice.

Response

AMSA intends to proceed with this change as the proposal will help reduce unnecessary regulatory burden while maintaining appropriate safety outcomes by focusing compliance requirements on the area affected by the modification. AMSA will also develop supporting guidance material to provide greater clarity and help stakeholders understand how these requirements apply in practice.



Amend the survey requirements for vessels with certain Schedule 1 changes

What AMSA proposed

Change to existing requirements: Amend the survey requirements for vessels with certain Schedule 1 changes.

Applies to: Vessels with a Schedule 1 change.

We proposed an amendment to the survey requirements for certain types of Schedule 1 changes.

This included only requiring an initial survey for the area of the vessel e.g. engine, affected by the change for either:

- clause 7(b): an increase in propulsion power, or
- clause 8: a change to the vessel's loading, structure or watertight integrity that requires the vessel's structural or stability design approval to be re-assessed.

Vessels with these changes would not need to reassess areas unrelated to the change.

Feedback

Feedback was generally supportive of this proposal. Some stakeholders sought greater clarity regarding the scope of the proposal. Others sought information on the circumstances in which the revised survey requirements would apply and how the requirements would be implemented in practice.

Response

AMSA intends to proceed with the change as the amendments are intended to reduce unnecessary survey requirements while ensuring appropriate oversight of modifications that may affect vessel safety. AMSA acknowledges stakeholder requests for greater clarity regarding the operation of the revised survey requirements. Supporting guidance material will be developed to clarify the types of changes covered by the proposal and how the revised requirements will operate in practice.

Reduce requirements when updating certain vessel components and equipment

What AMSA proposed

Change to existing requirements: Reduce the requirements when updating certain vessel components and equipment.

Applies to: Existing vessels changing certain vessel components and equipment.

We proposed to reduce the transitional standards that apply to a vessel when there is a change to any of the following aspects:

- battery type or capacity
- fixed fire system



- gas system
- electrical power and generators.

This proposed change would enable existing vessel owners to make improvements without triggering transitional requirements for the whole vessel. Owners would still need to:

- ensure the updated components and equipment meet current standards
- comply with a reduced set of transitional standards for other aspects of the vessel.

Feedback

Feedback was generally supportive of this proposal. Some stakeholders raised concerns about the potential compliance impacts of the new Schedule 1 triggers for battery systems, fire systems, gas systems and electrical systems, and sought greater clarity regarding the circumstances in which these changes may trigger additional regulatory requirements.

Response

AMSA intends to proceed with this change as the amendments will make it easier for vessel owners to modernise and improve vessel systems while ensuring new or replacement systems continue to meet current safety standards. AMSA acknowledges stakeholder requests for greater clarity regarding the treatment of vessel modifications and the circumstances in which additional requirements may apply. AMSA will also develop supporting guidance material to assist stakeholders in understanding how these provisions operate in practice.

Align timeframes with the 5-year survey cycle

What AMSA proposed

Change to existing requirements: Align timeframes with the 5-year survey cycle.

Applies to: Vessels relying on a previous certificate of survey to determine the standards or survey requirements that apply.

We proposed to change the timeframe from 2 years to 5 years for the maximum length of time:

- a new vessel can re-enter survey while still using the standards that applied to the vessel when it was issued a certificate of survey
- a vessel last held a certificate of survey when applying for a renewal
- before a vessel with an expired certificate of survey is required to undergo an initial survey before a certificate of survey can be issued.

We also proposed to introduce a maximum 5-year period during which a previously permitted type of operation may be reinstated without being treated as a Schedule 1 change.

These changes would align with the 5-year survey cycle.



Feedback

Feedback was generally supportive of this proposal. Stakeholders described this as a positive change that aligns timeframes with the 5-year survey cycle.

Response

AMSA intends to proceed with this change as aligning these timeframes with the 5-year survey cycle will simplify arrangements and improve consistency within the survey framework.

Allow more time to conduct periodic surveys

What AMSA proposed

Change to existing requirements: Allow more time to conduct periodic surveys.

Applies to: Vessels undergoing their periodic survey.

We proposed an increase to the timeframe in which certain vessels have to undergo a periodic survey. The change would apply to medium-risk vessels and allow a 'Year 3 periodic survey' to be completed in the 15 months before, or 3 months after it is due. This change would give these operators more flexibility to complete a periodic survey.

Feedback

Feedback supported providing greater flexibility for periodic survey timing, noting that a broader survey window would assist operators to schedule surveys around operational requirements while maintaining appropriate safety oversight.

Response

AMSA intends to proceed with the change as the increased survey window will provide greater operational flexibility while maintaining the integrity of the survey system and continuing to support safe vessel operations.

Clarify that a copy of an electrical survey must be supplied to the person conducting the commissioning survey of a vessel

What AMSA proposed

New requirement: Clarify that a copy of an electrical survey must be supplied to the person conducting the commissioning survey of a vessel.

Applies to: Vessels undergoing initial survey.

We proposed a requirement for a copy of an electrical survey to be provided to the person conducting the commissioning survey of a vessel if the electrical survey was done by a licenced electrician or a person qualified only for extra-low voltage survey. The person conducting the commissioning survey would have responsibility for providing AMSA with a copy.



Feedback

Feedback was generally supportive of this proposal. One stakeholder recommended that guidance material be developed to clarify documentation requirements and support consistent implementation. Another stakeholder raised concerns about the potential administrative burden on AMSs arising from managing electrical survey documentation.

Response

AMSA intends to proceed with this change. Guidance material will be developed to support implementation of the requirement and clarify expectations regarding electrical survey documentation.

Clarify that a person conducting an electrical survey must hold appropriate public liability insurance

What AMSA proposed

New requirement: Clarify that a person conducting an electrical survey must hold appropriate public liability insurance.

Applies to: Persons conducting electrical surveys.

We proposed to clarify that anyone who is undertaking an electrical survey must hold appropriate public liability insurance. This is consistent with the insurance requirements for persons conducting other types of surveys.

Feedback

Responses to this proposal were mixed, with three submissions seeking greater clarity regarding the insurance requirements that would apply to persons conducting electrical surveys and how compliance with those requirements would be demonstrated. Specifically, stakeholders asked if professional indemnity insurance would be more appropriate than public liability insurance.

Response

Following consideration of stakeholder feedback, AMSA will not proceed with the proposed requirement for persons conducting electrical surveys to hold public liability insurance. Persons conducting electrical surveys will instead be required to hold professional indemnity insurance, consistent with the requirements applying to AMSs. Guidance material will be developed to clarify the insurance requirements.



Increase the survey frequency category for traditional timber vessels

What AMSA proposed

New requirement: Change the survey frequency requirements for wooden vessels at their next renewal.

Applies to: Traditional timber vessels.

We proposed a change to the survey frequency for traditionally constructed timber vessels at their next reissue of a certificate of survey. Vessels without a modifier condition would move to a medium survey frequency category, and those with a modifier condition would move to a high survey frequency category.

Feedback

Stakeholder views on this proposal were mixed, with some responses welcoming the change, some concerned that it would be too burdensome and some wanting greater clarity about what types of vessels would be affected. More detail was requested about what sort of construction techniques AMSA considers to be traditional timber constructions. Feedback from industry peak bodies highlighted that there are a limited number of these vessels still operating but care needed to be taken to ensure that the proposed change doesn't become overly burdensome when implemented together with other changes to survey standards.

Response

AMSA intends to proceed with the proposed change as the increased survey frequency for these vessels is an important change to ensure the safety of wooden hulls, which can rapidly deteriorate. We propose to include a definition of traditional timber construction to provide greater clarity about which vessels would be affected by this change.

Allow a certificate of survey to be varied to reduce the number of people allowed on board

What AMSA proposed

Change to existing requirements: Allow a certificate of survey to be varied to reduce the number of people allowed on board.

Applies to: Vessels seeking to reduce the number of people they are permitted to carry.

We proposed to allow a certificate of survey holder to seek a variation when reducing the number of people they are permitted to carry on board. This would reduce the costs for survey holders because they would no longer need to submit a full renewal application when making this change.

Note: Minimum and appropriate crewing requirements under Marine Order 504 will still apply.



Feedback

Feedback was generally supportive of this proposal.

Response

AMSA intends to proceed with this change as the amendment will reduce unnecessary administrative burden while maintaining safety standards.

Increase the maximum period a certificate of survey may be suspended for

What AMSA proposed

Change to existing requirements: Increase the maximum period a certificate of survey may be suspended for.

Applies to: Non-compliant vessels.

We proposed an increase to the maximum duration a vessel can have its certificate of survey suspended for, from 6 months to 24 months. This change would align Marine Order 503 with the suspension periods in other marine orders.

Feedback

Stakeholder views on this proposal were mixed. While some stakeholders supported aligning suspension periods with other marine orders, others expressed concern that increasing the maximum suspension period from 6 months to 24 months could have significant commercial impacts if applied broadly. Stakeholders sought greater clarity regarding the rationale for the increase, the circumstances in which longer suspension periods would be used, and how suspension durations would be determined.

Response

AMSA intends to proceed with the change, as this will bring the maximum suspension period in MO503 in line with other marine orders. This change will only increase the maximum allowable duration of a suspension and does not require all suspension periods to last this long. AMSA employs a range of tools that escalate in severity as the need arises. These tools include education and assistance, the issue of directions or notices, suspension or cancellation of certificates, fines, imposition of civil penalties, and criminal prosecutions. Further details about our compliance policies are available in our [Compliance Strategy 2023-27](#). We will also provide more guidance material to support this change and explain the purpose behind it.



Clarify the conditions where AMSA may revoke a certificate of survey

What AMSA proposed

Change to existing requirements: Clarify the conditions where AMSA may revoke a certificate of survey.

Applies to: Vessels involved in marine incidents or vessels that are no longer DCVs.

We proposed to clarify that AMSA may revoke a certificate of survey if a vessel is involved in a serious incident, such as sinking or being significantly damaged. This change would ensure vessels are suitably repaired and re-certified before restarting operations after a serious incident.

We also proposed to clarify that AMSA can revoke a certificate of survey if a vessel stops operating as a DCV. This could be because a vessel:

- has been decommissioned
- has become a regulated Australian vessel
- has become a foreign-flagged vessel.

This change would reduce the potential for confusion about the status of the vessel and ensure that AMSA has accurate data on the DCV fleet.

Feedback

Stakeholders generally sought greater clarity regarding the circumstances that may result in revocation and how these provisions would operate in practice. Some submissions also requested further explanation of the policy rationale for revoking a certificate of survey following a serious incident, including the circumstances in which the power would be exercised and the guidance that would be available to support its application.

Response

AMSA intends to proceed with this change as the amendments are intended to ensure vessels are appropriately reassessed where significant damage has occurred or where these vessels have permanently left the DCV fleet. AMSA acknowledges stakeholder requests for greater clarity regarding the circumstances in which a certificate of survey may be revoked. AMSA will develop guidance material to provide additional information about how these provisions operate in practice.

Require vessel owners to notify AMSA if an insurance claim is made on a damaged vessel

What AMSA proposed

New requirement: Require vessel owners to notify AMSA if an insurance claim is made on a damaged vessel.



Applies to: Vessels that have been damaged and an insurance claim made.

We proposed to require a vessel's owner to notify AMSA if they make an insurance claim on a vessel that has been damaged. This would ensure AMSA is aware of vessels that have been significantly damaged and that may need to be reassessed before resuming operations.

Feedback

A number of stakeholders raised concerns with this proposal, commenting that the requirement would result in the overreporting of minor and cosmetic damage with limited safety benefits and duplicate existing marine incident reporting obligations. Stakeholders also questioned the regulatory rationale for linking insurance claims to notification requirements and sought clarification about whether operators would be required to submit commercially sensitive information to AMSA.

Response

AMSA has decided not to proceed with this change at this time. The proposal was intended to improve reporting of vessel damage to AMSA in circumstances where existing marine incident reporting requirements may not be consistently understood or applied.

Instead, AMSA will focus on improving education about the existing requirement to notify AMSA when a vessel is involved in a marine incident, including any instance where a vessel is damaged. We will produce communication and guidance material to highlight that any damage that requires an insurance claim may also require reporting to AMSA under existing marine incident reporting requirements.

As a point of clarification, AMSA has no intention of collecting information about insurance premiums, excesses or other commercial-in-confidence information. The proposal would instead have required a separate report about damage sustained to a vessel where an insurance claim had been made.

AMSA may revisit this proposal at a later date if there are ongoing concerns regarding the reporting of vessel damage.

Clarify who is responsible for notifying AMSA of a change in vessel ownership

What AMSA proposed

Change to existing requirements: Clarify who is responsible for notifying AMSA of a change in vessel ownership.

Applies to: Vessels changing ownership.

We proposed to require that the person receiving a vessel (e.g. a buyer) must notify AMSA of a change in vessel ownership instead of the person handing over the vessel (e.g. a seller). This change would ensure that the person who becomes responsible for the vessel informs AMSA of the change in ownership.



Feedback

Stakeholders were broadly supportive of this change. Some responses raised that it would be preferable to have both parties notify AMSA, as long as the process is streamlined. This would help in situations where a DCV is sold to an owner intending to use it as a recreational vessel and who has no knowledge of AMSA or the national system.

Response

AMSA intends to proceed with this change. However, following stakeholder feedback, we will modify the proposed requirement so that both the seller and the buyer have responsibility for notifying AMSA of a change in ownership. We are also looking at ways to simplify the process and avoid duplication.

Clarify when certain existing vessels become transitional vessels

What AMSA proposed

Change to existing requirements: Clarify when certain existing vessels become transitional vessels.

Applies to: Existing vessels obtaining a certificate of survey for the first time.

We proposed to clarify that existing vessels that are issued a certificate of survey for the first time would become a transitional vessel and must meet the relevant transitional standards. This would only apply to existing vessels that previously did not have a certificate of survey due to operating under an exemption.

Feedback

Stakeholders generally supported efforts to improve clarity regarding the transitional vessel provisions. Some submissions expressed concern that the proposed changes could result in existing vessels, including vessels operating under grandfathering arrangements, becoming transitional vessels and being required to comply with newer standards despite there being no material change to the vessel or its operation.

Response

AMSA intends to proceed with this change as the amendments are intended to clarify when a vessel becomes a transitional vessel and the standards that apply, rather than expand the circumstances in which vessels become transitional vessels. AMSA acknowledges stakeholder requests for greater clarity regarding the operation of the transitional vessel provisions. AMSA will provide supporting guidance material.

Remove the hull material from the definition of ‘modifier’

What AMSA proposed

Change to existing requirements: Remove the hull material from the definition of ‘modifier’.



Applies to: Vessels with a hull at least 15 years old.

We proposed to stop using hull material as a criterion for deciding if an older vessel needs more frequent surveys. Age is the most significant factor for determining a vessel's risk and all vessels with a hull at least 15 years old would be required to undergo more frequent survey.

Feedback

Some stakeholders were not supportive of this change, raising concerns that it would lead to increased survey costs for a large number of vessels without clear safety improvements. Several responses commented that age should not be the sole determinant of a vessel's risk profile, and that vessel condition and hull construction remain important considerations when assessing structural risk. Stakeholders noted that aluminium and steel vessels can be assessed using techniques such as ultrasonic hull thickness testing, allowing survey requirements to be targeted to the condition of the vessel rather than applied solely on the basis of age.

Response

AMSA has decided to not proceed with this change. The proposal was intended to improve assurance regarding the structural integrity of all ageing vessels, recognising that vessel condition can deteriorate over time regardless of hull material. Following consideration of stakeholder feedback, AMSA will maintain the existing definition, which requires more frequent surveys for vessels that are at least 15 years old, except for vessels with an aluminium or steel hull.

AMSA will continue to monitor the structural integrity of older hulls in the DCV fleet and consider alternative methods to assess structural condition and manage safety risks. This may include the use of ten-yearly ultrasonic testing of aluminium and steel hulls to detect signs of fatigue and target regulatory oversight where it is most needed.

Allow AMSA to make determinations and approvals on our own initiative

What AMSA proposed

New requirement: Allow AMSA to make determinations and approvals on our own initiative.

Applies to: Vessel owners seeking a determination or approval mentioned in the Surveyors Accreditation Guidance Manual Part 2.

We proposed to enable AMSA to make determinations or approvals in specified circumstances without the need for an application. This would reduce administrative burden and allow vessels to use correct standards or approvals without delay.



Feedback

Feedback was generally supportive of this proposal. However, some stakeholders sought greater clarity regarding how AMSA may exercise these powers to ensure it does not result in inconsistent application of safety standards.

Response

AMSA intends to proceed with this change as the amendment will enable AMSA to make appropriate determinations and approvals more efficiently while maintaining existing safety outcomes. AMSA acknowledges stakeholder requests for greater clarity regarding the operation of these provisions. Guidance material will be developed to support implementation.

Remove the EIAPP certificate requirements from Marine Order 503 as they are now covered in Marine Order 97

What AMSA proposed

Change to existing requirements: Remove the Engine International Air Pollution Prevention (EIAPP) certificate requirements from Marine Order 503 as they are now covered in Marine Order 97

Applies to: Vessels required to have an EIAPP certificate.

We proposed to remove the requirement in MO503 that some vessels must have an EIAPP certificate in order to be issued a certificate of survey. These vessels would still need to have an EIAPP certificate, but this requirement is now managed through Marine Order 97.

Feedback

Feedback was generally supportive of this proposal, noting that it would remove duplication and simplify the regulatory framework. Stakeholders also noted the importance of ensuring that there are no changes to certification requirements and queried whether both engine suppliers and DCV owners were aware of the requirements in Marine Order 97.

Response

AMSA intends to proceed with this change as the amendment removes duplication within the regulatory framework and improves clarity. Vessels that are required to hold an EIAPP certificate will continue to be subject to the relevant requirements in Marine Order 97. AMSA will continue to work with industry to promote awareness of these requirements and support compliance with the applicable certification arrangements.

Minor editorial changes

What AMSA proposed

We proposed minor editorial changes to:

- present information in a clearer manner, through tables or descriptions



- clarify existing standards that apply, or can apply
- remove unnecessary provisions
- include notes to provide the reader with additional relevant information
- correct drafting errors.

These changes would improve the readability of the marine order and provide greater clarity on the requirements for operators.

Feedback

Feedback was generally supportive of these changes. Some submissions suggested further editorial and explanatory improvements, including greater clarity around the transitional vessel triggers and timings for renewal surveys. Suggestions were also made to improve document navigation through the use of bookmarks and hyperlinks, and to provide additional explanatory materials, guidance or industry briefings to assist interpretation of the revised provisions.

Response

AMSA acknowledges stakeholder suggestions regarding the clarity and usability of the draft marine order. Marine orders are drafted in accordance with legislative drafting principles and requirements, which may limit the extent to which features such as hyperlinks can be incorporated into the instrument itself. AMSA will continue to develop supporting guidance and explanatory materials, ensuring these materials remain accessible and assist industry in understanding and applying the revised requirements.



Other feedback

Industry reference groups and stakeholder engagement

- **Feedback** - Two submissions encouraged AMSA to make greater use of industry reference groups (IRGs) and other collaborative engagement mechanisms when developing significant regulatory reforms. Stakeholders considered that early engagement with industry experts and operators can help identify unintended consequences, improve clarity, strengthen stakeholder understanding of proposed changes and support more practical regulatory outcomes.
- **Response** – AMSA acknowledges stakeholder feedback regarding the value of IRGs and early engagement during regulatory development. AMSA is committed to continuing to establish IRGs for regulatory reviews. AMSA recognises that participation in these groups requires a considerable investment of time and resources from stakeholders and will therefore seek to use this engagement mechanism where it is likely to add the greatest value. AMSA will also consider any other appropriate opportunities for expert and industry engagement in the development of future regulatory reforms.

Regulatory costs and compliance burden

- **Feedback** - Several submissions commented on the potential cost impacts of the proposed reforms. While stakeholders supported measures that reduce unnecessary compliance costs and administrative burden, they expressed concern that some proposals could increase survey, certification and other related compliance costs without clear safety benefits. Stakeholders also questioned whether the regulatory costing adequately reflected the cumulative impact of the proposed changes on operators, particularly those operating older or complex vessels, and sought further information regarding the regulatory impact assessment process.
- **Response** - AMSA conducts regulatory impact analysis including costings for the development of regulatory instruments in line with the Australian Government's Impact Analysis Framework and Regulatory Burden Measurement Framework. The proposed amendments have been developed to support safety outcomes while reducing unnecessary regulatory burden where possible. The Office of Impact Analysis was also consulted on the proposed changes, including regulatory costs. Feedback regarding regulatory costs and implementation impacts has been carefully considered in finalising the amendments, including decisions not to proceed with several proposed changes. AMSA will continue to consider cost impacts, proportionality and regulatory burden when developing future reforms.

Reviewability of equivalent means of compliance decisions

- **Feedback** - One submission raised concerns that the removal of reviewable decision status for the revocation of an equivalent means of compliance (EMOC) approval may unintentionally remove a right of merits review. The submission suggested that retaining review rights is important to provide certainty for operators who rely on approved alternative compliance arrangements.
- **Response** - AMSA acknowledges the concerns raised regarding reviewability of decisions to revoke an EMOC approval. The drafting has been reviewed to ensure the intended review rights continue to apply.



Documentation and vessel records

- **Feedback** – One submission requested more documentation clarifying vessel standards be required to be carried onboard, along with access to vessel drawings and other reports in MARS. The submission also requested older vessels built overseas be required to have greater documentation about their initial survey.
- **Response** – AMSA acknowledges stakeholder feedback regarding access to vessel documentation, drawings and survey records. While AMSA is not proposing changes to documentation requirements as part of this review, the feedback has been noted. AMSA will continue to consider opportunities to improve access to information and guidance that supports compliance with vessel standards and survey requirements.

Out of scope feedback

The following suggestions were out of scope of the certificates of survey review:

Certificates of competency

- **Feedback** – Two submissions commented that there was insufficient information about what certificates of competency are needed to operate DCVs.
- **Response** – AMSA notes the comments. Certificate of competency requirements are outside the scope of the review. Information about which certificates are required to operate certain vessels is available [on our website](#).

Compliance matters

- **Feedback** – One submission raised compliance concerns with particular vessels.
- **Response** – This feedback was shared with AMSA's compliance teams and AMSA notes that unsafe behaviour should be reported as a [marine safety concern](#).

Class 3 vessels and passengers

- **Feedback** – One submission proposed that Class 3C vessels should be allowed to carry passengers.
- **Response** – A Class 3 fishing vessel is not certified to carry passengers. Changing the service category to add Class 1 or Class 2 enables a vessel to operate while carrying passengers.

Periodic surveys for electrical systems

- **Feedback** – One submission raised concerns about the lack of required periodic survey of electrical systems on vessels, including novel vessels.
- **Response** – AMSA notes this feedback and will consider it as the Novel Vessel Framework is developed.



Survey frequency based on operator performance

- **Feedback** - One submission proposed a performance-based approach to survey frequency, where vessels with demonstrated compliance and strong safety performance would be subject to less frequent survey and inspection requirements, while operators with poorer compliance outcomes would be subject to increased regulatory oversight. The submission suggested this would provide incentives for operators to improve safety performance while reducing regulatory burden for high-performing operators.
- **Response** - AMSA acknowledges the suggestion for a performance-based approach to survey frequency. While this proposal is outside the scope of the current Marine Order 503 review, AMSA will consider this feedback in the development of future reforms.

Out-of-water survey timing

- **Feedback** - One submission requested greater flexibility to allow out-of-water surveys to be conducted earlier than required where a vessel is already being slipped for maintenance. The submission noted that additional applications and fees may be incurred when seeking to align survey dates with planned maintenance activities.
- **Response** - AMSA acknowledges the issues raised regarding the alignment of out-of-water surveys with planned maintenance activities. This matter is outside the scope of the current Marine Order 503 review. However, the feedback will be considered as part of any future review of survey scheduling arrangements and associated administrative requirements.

Other standards and operational requirements

- **Feedback** - One submission proposed a number of changes outside the scope of the current review, including broader recognition of classification society rules, changes to operational area limits for Class C vessels, greater flexibility for vessels fitted with single outboard petrol engines, and additional recognition of vessels fitted with basic buoyancy.
- **Response** - AMSA acknowledges these suggestions. These issues are outside the scope of the current Marine Order 503 review and have not been considered as part of the proposed amendments. However, they will be considered in the development of future policy and standards where relevant.