



Australian Coral Reef Society Inc

Promoting the scientific study of Australian coral reefs

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Submission to the Australian Maritime Safety Authority on the proposed new Marine Order 505

26 September 2019

The Australian Coral Reef Society (ACRS) is the oldest organisation in the world dedicated to the study and conservation of coral reefs. Founded in 1922, it now supports and represents over 300 coral reef scientists in Australia who collectively grow our understanding and conservation of coral reef ecosystems through dedicated research. In this capacity, we request that Exemption 15 be retained in the proposed new Marine Order 505 for the benefit of scientific research and educational activities.

Currently, Exemption 15 allows scientists with a recreational boat licence to operate a domestic commercial vessel, less than 7.5 m long, for the purposes of scientific research or education within the Great Barrier Reef (GBR) region, the Torres Strait zone or in defined smooth or partially smooth waters. Exemption 15 has allowed us to conduct cost-effective and wide-ranging research throughout these areas, including the economically and culturally significant GBR. The removal of this exemption in its current form would hinder our ability to conduct quality research that directly informs the preservation of these natural resources that are important to the Australian economy.

As marine scientists, we welcome the streamlining and simplification of maritime safety laws through the proposed new Marine Order. We support the establishment of the Coxswain Class 3 NC for some duties under Marine Order 505, and agree that a recreational marine driver's licence is sufficient for a Coxswain Class 3 NC certificate. However, we request that Exemption 15 be retained, as written, in order to create stability and efficiency within the regulatory process. Under Marine Order 505, a Coxswain Grade 1 or 2 would be required to conduct the majority of operations completed by researchers, unless Exemption 15 is retained. The undertaking of a Coxswain Grade 1 or 2 is not feasible for researchers due to time and budget constraints.

The expiration of Exemption 15 and current format for Coxswain Class 3 NC represents a significant reduction in our research capacity without a comparable increase in maritime safety. For example, while we support the assessment of medical fitness for the tasks covered by Exemption 15, it is unclear what form this would take in the proposed order. Recreational boat licences do not require a formal assessment; as such we suggest that a self-declaration of medical fitness be more appropriate.

Under the proposed order, Coxswain Class 3 NC would limit operations to 1 nautical mile (nm) from shore. This is a considerable reduction in the area of operations compared to AMSA Exemption 15 where vessels can operate according to their Certificate of Operation. A large portion of reefs in the GBR and Torres Strait zone exist greater than 1nm from shore; therefore, the proposed order would prohibit our access to these areas and so the breadth of our research output. We request that if Exemption 15 is not retained, then the Coxswain Class 3 NC should be extended to cover operations in all sheltered waters (including partially smooth waters) rather than just smooth waters 1 nm from shore.

Australian researchers are largely associated with universities who implement their own safety regulations in addition to those from AMSA. These are rigorous, involve regular demonstrations of user competency, and are often tailored to hazards or risks specific to particular locations and activities. By applying new changes to AMSA maritime safety laws, the efforts of universities to maximise safety while safeguarding the capacity for quality research will be undermined.

Finally, we emphasise that Australia is a global centre for coral reef research, and as such we attract a large number of international collaborations. The proposed order, which would require researchers to obtain a Coxswain Grade 1 or 2 certificate, runs the risk of reducing the research capacity of visiting scientists by removing the ability to get a time and cost-effective licence for their research activities in Australia. Additionally, a requirement for the assessment of medical fitness as mentioned above is also likely to hinder the research of international visitors. We stress the need to ensure that the proposed requirements have international equivalents to maintain ease of access for international researchers. In addition, international First Aid certificates need to be acceptable.

In summary, the ACRS supports the maintenance of Exemption 15 for the benefit of researchers and the contributions they make towards the nation. We believe the Annual Regulatory costs of less than \$1000 to business and individuals is a gross underestimate of the true impact that the removal of this exemption will have on research. Should AMSA nonetheless continue to pursue the proposed order in its current form, we suggest a longer transitional period to minimise the impact this is likely to have upon Australian coral reef research.

Sincerely,



Dr Anna Scott

President, Australian Coral Reef Society

ACRS thanks councillors Gus Fordyce, Sam Goyen, and Catheline Froehlich for writing and the ACRS council for editing.