Australian Government
Australian Maritime Safety Authority

Consultation Report

National Standard for Commercial Vessels, Part F2 – Leisure Craft

The revision of the *National Standard for Commercial Vessels, Part F2 – Leisure craft* (NSCV Part F2) has been informed by public feedback and input provided by a reference group made up of members from state & territory marine safety agencies, industry representatives and technical experts. The consultation that has been undertaken includes:

- A discussion paper in July 2013 to define the scope of the revision,
- An initial reference group meeting in September 2013 in Sydney for NSCV Part F2 that identified confusion for industry in relation to vessels that were described in both NSCV F2 and Part G.
- A subsequent reference group meeting in April 2014 in Adelaide to review the technical content for NSCV Part F2 and Part G before making a draft available for public consultation.
- Public consultation via the AMSA website on the draft standard (*NSCV Part F2 – Leisure craft and non-survey vessels* - that subsumed the technical content from NSCV Part G) between 2 January 2015 and 13 February 2015 – 443 comments were received.
- A reference group meeting in March 2015 to review the public submissions and consider technical matters.
- The 'NSCV Part F2 consultation report' was made available on the AMSA website from May 2015 to October 2015 detailing the outcomes of the review of the submissions.
- Further feedback was sought from industry via the AMSA website in July 2015 - 287 comments were received and considered on the following drafts:
    - *Marine Order 503 (Certificates of survey – national law) Amendment 2015 (MO503)*
    - *Domestic Commercial Vessel Manual – Leisure craft*
    - *Domestic Commercial Vessel Manual – Non Survey Vessels*
- A final draft of NSCV Part F2 was made available for public consultation via the AMSA website in August 2016, the following 191 comments and submissions shown in table 1 were received and considered by AMSA.

  Note A final draft of NSCV Part G was also made available for public consultation via the AMSA website in July 2016.

Table 1 – Comments and submissions received during the August 2016 consultation period

Note AMSA has removed all references to peoples or organisations names from this report.

Comment No.	Provision / Clause	Industry comment / submission	Response to submission
1.	General	We are generally very happy with the acceptance of CE construction modules for compliance. The requirement for 4C boats over 12m to have B and E construction modules for compliance will make it a little difficult or near impossible to put boats in that survey category. If the compliance of 12 m to 15 m vessels would be accepted with the B and C module construction modules that would be great. There is a big jump in size from 15 to 24 m, it is extremely unlikely that a bareboat / houseboat would ever be contemplated over 15m.	Please note that table 7 in the standard allows that the modules B + C are permitted. The ticks under each column are intended to represent that all those ticked are applicable options - it is not the intention that all the modules are required. The standard will be updated to further clarify this intent. The standard provides for leisure craft up to 24m.
2.	Definition	From my reading of the definition of class 4 vessels they cannot be over 15m. In any case, should 4C read 12 m to 15 m, not 12 m to 24 m.	The standard provides for Class 4 leisure craft that are less than or equal to 24m (measured length) - see clause 2.1.
3.	Tenders	Tenders. We need some clarification. Where we have boats in a 2C area where the dinghy is to be used as a dual purpose tender and life raft. Would life jackets need to be worn at all time in that tender? The requirement that the tenders have a lifejacket on board for each person is from a practical position very difficult to manage. The storage of the jackets will take up significant space in the tender and the maintenance of the equipment will be very difficult. Where the tender has a positive floatation certificate with the appropriate grab lines and used in partially smooth tropical waters. Is this requirement really necessary? Generally tenders and dinghies are referred to in a number of areas in the document. Possibly they need to be better defined. A little more clarification would be great.	Tenders requirements are found in NSCV Part G. Lifejacket are required to be carried on-board all vessels. Lifejackets would also be required on most recreational vessels as an essential life saving device. Level flotation & positive flotation are essentially the same requirement (just different terminology).
4.	Operational Matters & Prop guards	General observations. The new standards refer to specific requirements to the individual class vessels (such as safety gear), they also refer to the operation of those vessels. From an operational position it would be beneficial if we could adopt those new operational policies rather than have a different operational policy for individual boats within our fleets. This may in fact be the case. Some clarification would be great. Also from an enforcement position, I imagine one set of rules will be easier for everyone. Additional safety requirements. Tenders again: We recommend that all tender outboards be fitted with prop-guards. This is already standard practice within the Bareboat and Overnight Charter boat industry in our area.	Noted and considered. Whilst the equipment tables are based on area of operation, there is no reason why a vessel in E waters cannot carry the higher requirements for vessels operating in C waters if you wanted all your vessels to have the same complement of equipment. Similarly in regards to operational requirements. You may choose to apply all requirements to all vessels in your fleet if that is more applicable and suits your operation and risk assessment.

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5.	Bilge Pumping	3.8 (3) states that each bilge pump must be capable of pumping from any compartment. Many CE boats are fitted with ELV pumps which are an all-in-one unit of the suction, strainer and pump which goes directly overboard. Being a permanently mounted pump, this cannot service another compartment. If each compartment is fitted with one of these pumps, the vessel may be fitted overall with, say, 4 four pumps, exceeding the nominated amount in Table 5 for a 12m vessel, however, each pump can only service the compartment it is fitted in. Clarification needs to be made as to whether an additional pump needs to be fitted in each compartment, or an additional portable pump, etc.	Noted. The clause has been e updated to clarify the intent.
6.	11.9	Most CE vessels coming in from overseas are from large production yards. It would be almost impossible to get these companies to release a Lines Plan. It is reasonable to expect any changes are checked and verified, including stability assessment, but the lines plan (whilst a better option) should not be a stipulated requirement as it may not be able to be attained.	Noted. This has been updated to only ask for lines plans where the vessels lines have been altered.
7.	4.1	One issue we came up with when assessing vessels against the Draft of the DCV Manual was "what is considered an acceptable berth?". Again in this draft there is little information on it. CE certifies person numbers based on stability, not on the berth numbers. So it would be unreasonable to just apply the CE certified numbers for overnight operations. Chapter 11 takes the CE Certification at face value with no reference to 4.1 for sleeping accommodation. In particular, we had cases of very small crew cabins being installed under the foredeck and in the forepeak of catamarans. These often only have one entry from a hatch in deck, and do not have separate ventilation etc. The assessment made between us and MSQ was that these could be deemed acceptable if an additional escape hatch to the main accommodation and ventilation were added to the cabins. 4.1 notes what is considered a temporary berth, but as I read it, there would be no further analysis on small crew cabins, and would therefore be acceptable as permanent berths, with no additional requirements of escape, access or ventilation. This has a potential to be interpreted differently between the assessing surveyors.	Noted. Class 4 vessels are not permitted to have 'crew'. Crew implies the vessel is a Class 2 vessel, which would have to comply with Part C of the NSCV. The berthing requirements in this standard are broad in nature, as it is envisaged that it will be driven by market forces (based on comfort of the hirer etc.) as Class 4 vessels are hire and drive and are solely used for recreational purposes.
8.	Table 3	The compass requirement shows a 75mm diameter compass, with compass deviation card. I know of people struggling to get compass' swung here based on not many people being available for that service. Based on Table 3 it	Part F2 does not require compass swings. However, the standard has been updated to provide that compasses

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		would appear all of these low-risk vessel will still require their compass swung, which could be difficult to comply with.	must not deviate from the true heading my more than 5 degrees on any heading.
9.	4.8 (8)	The loading requirement on fixed solid guardrails is very high, and makes the sections extremely large. These are the same figures used in NSCV Part C Section 1, but having tried to design guardrails to these recently, the only option was to use the less safe option of wire courses, as those criteria are reasonable to apply. In comparison to the widely used and accepted AS1657, which was only recently updated in 2013, the point load on the top rail is only 600N and the distributed load is 350N/m, which is far more reasonable and produces sections which are reasonable to construct and install.	The criteria specified in F2 (and C1) is taken from USCG CFR Title 46 116.900. It requires that "Deck rails must be designed and constructed to withstand a point load of 91 kilograms (200 pounds) applied at any point in any direction, and a uniform load of 74 kilograms per meter (50 pounds per foot) applied to the top rail in any direction. The point and uniform loads do not need to be applied simultaneously." CFR Title 46 part 116 also requires a similar loading for smaller vessels. However we acknowledge that standards which consider "hire and drive" type vessels specifically do not have similar requirements in them e.g. the MCA Code for the Design, Construction and Operation of Hire Boats or ISO 15085 - Man-overboard prevention and recovery. The criteria has been updated to use the AS1657 criteria.
10.	Chapter 9	What would be the intention in regards to approving an electrical system to Chapter 9. Would this be inspected and approved by an Electrical Contractor, or would an accredited Electrical Surveyor be required to assess and approve the electrical system?	The requirements for surveys of a vessels electrical systems are described in section 11 of Marine Order 503 (Certificates of survey—national law) 2013 - and permit these surveys to be conducted by either: * a person who holds an electrical contractor licence (however described) issued by a State or Territory, or * an accredited marine surveyor who is accredited to perform electrical surveys.
11.	10.4	When assessing a boat against CE Certification, it also calls upon Chapter 10.4 for the flotation requirements. But Table 6 notes that for vessels above 6m, that ISO12217-1 is an acceptable means of compliance. It would seem, therefore, that a CE vessel which has a Declaration of Conformity showing compliance to ISO12217-1 would be acceptable in meeting this requirement. What is confusing is that Table 6 says "The vessel must meet the	The declaration is sufficient. A note has been added to the standard to provide further clarity.

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		requirements and test procedures contained in one of the following standards". Is this suggesting the test procedures must be verified, or is the Declaration of Conformity sufficient in showing compliance with this clause?	
12.	0	1. Through deck hatches should be provided with a method of preventing persons falling through when in the opened position. The reason for this is that there have been a number of marine incidents in Queensland that caused injury to the persons on board when they fell through fully opened through deck hatches. A method that I have used in the past has been to fabricate a ladder type tube item that when the hatch is opened is swung out and located with pins into sockets. That way no persons can fall through the opening. Then when not in use it is swung back and retained by clips to allow the hatch to be closed and secured.	Noted. This is not within the scope of this standard.
13.	5.4.1	Also the sewage discharge / release areas need to be clearly described and shown in chartlets for the crew - this could be placed in the Safety management plan area (5.4.1) or other suitable place.	Noted. Environmental management is ordinarily legislated by the states and Territory.
14.	9.1(2)(c)	Suggest the clause is updated to: (c) have a means to isolate the battery that is remotely located from the battery box;	Noted. The clause has been updated to provide for this intent.
15.	Table 1	The requirement for smoke detectors needs amending. The reason for stipulating a 10 year sealed detector was because hirers regularly removed the 9V batteries and the operators failed to check the operation. The requirement should be for a 10 year sealed PHOTOELECTRIC detector that meets AS3786. DC hardwiring is possible but the DC would need to be supplied from AC. To have them wired otherwise risks battery drain. Suggest you check this with the Houseboat Hirers Association in SA.	Noted. The clause has been updated to reflect the requirements in AS 3786.
16.	P34	11 of 8.8 should be in NSAMS not in the technical standard. Its pretty onerous as well- surely a better approach is to have a clause that limits what electrical wiring is in an area where it could cause a spark rather than subjecting the whole vessel to a check- example- in a cuddy cabin vessel with batteries outside of the engine space or bilge must an electrician check the whole vessels electrical system every year including stuff miles from any danger point.....Think this needs a re-think...	Noted. The standard has been updated to reflect that the electrical writing in the engine & bilge compartments are to be inspected as part of normal routine maintenance. The intention was not to inform additional survey requirements.

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17.	9.1	2(a) Should allow 24v as well. Becoming common in some larger vessels that this standard could apply to particularly as CE more accepted. Nil extra risk.	Noted. The clause has been updated to reflect 24v.
18.	Table 6	NT/WA/NQld- big crocs in the water inshore.... NT DOT didn't allow Carly floats in the past to avoid creating a croc smorgasbord...suggest you check and see if you need to add a croc caveat to the standard....	Noted. Option 3 in the table has been updated to reflect operational considerations and will not just be limited to water temperature.
19.	General	1. Overall, this is a very clear, well written standard and one that is well overdue for finishing. There is considerable confusion over this amongst our clients which is leading to older and potentially less safe vessels being retained in fleets. Not good. 2. I anticipate that the initial and periodic survey of these craft will not fit the current standard AMSA published forms-might I suggest that some leisure craft tailored ones are produced when this gets published. 3. Thanks for the chance to comment. Now if you could please sort out the dogs regurgitated breakfast that is C4 and finish C2 all will be good in the universe.	Thank you for your time and submission. The intention is to create some leisure craft specific survey forms. AMSA values your feedback. The revision of NSCV Part C4 is well progressed and will shortly be available for public consultation. Similarly, NSCV Part C2 (that essentially moves the relevant USL sections into a NSCV format) and F1 are also in progress and will be made available for public consultation by early 2017.
20.	Chapter 8 - 8.5 1(b)	Chapter 8 - 8.5 1(b) engine gearbox lubricating oil pressure. It doesn't mention that this is for Hydraulic Gearboxes used in shaft drive vessels only. Is this a requirement for outboards to? If so it would mean re-engineering OEM?	Noted. The clause has been updated to clarify the intent and align to NSCV Part C5A.
21.	Equipment requirement class 4e	Class 4E < 7.5m Fire Bucket, Is it necessary to carry a fire bucket on board? The likely hood of water coming in contact with liquid fuel or molten metal if a fire bucket was put into operation would significantly increase risk of personal injury or loss of vessel. A suitable sized fire extinguisher for the amount and type of fuel carried would be more appropriate.	Fire buckets are only required to be carried on-board Standard Houseboats.
22.	Chapter 3, Table 1	For a houseboat not to have an anchor is an extreme risk for a vessel that is large and subject to being blown across the water in strong winds. The risk of engine stall resulting in the requirement to drop anchor is very probable.	Noted. The table has been updated to clarify the intent.

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23.	Chapter 3, Table 1	The need now for the requirement to hard wire should be reviewed as building codes permit self-contained smoke detector units. Advances in smoke detectors reliability and operation since the hard wired requirement was put in the NSCV standard about 8 years ago may now be worth re-considering especially as we encourage the older vessels (pre National System) to retrospectively install.	Noted. The clause has been updated to reflect the requirements in AS 3786.
24.	Table 1 - 4	RMS would like to see consistency in the anchor and flare requirement across all tables. As the risk profile for vessels across the tables can be argued in many cases as very similar then the requirements should be similar. i.e. a houseboat and yacht operating in the same waters to have different requirements for flares and anchors is not an outcome we would generally support. A consistent anchor and flare requirement across all tables would be welcomed.	Noted. The anchors and distress signal requirements have been updated to provide greater alignment.
25.	Table 3 and 4	Compass size, as 75mm is quite large, is there a possibility to taper down for smaller boats?	The size is consistent with the NSCV for other vessels of this size.
26.	Table 5	Would recommend a review on capacities and break points on lengths as per previous remarks in the submission to the General Safety Requirements (GSR) standard review.	Noted. The table intends to align to the requirements in NSCV Part C that apply to other domestic commercial vessels. However, the table has been updated to reflect the lower ranges indicated in Part C.
27.	standards - page 5	Note- Anchor standard AS 2198:1983 Anchors for small boats has been "˜withdrawn"™ meaning "the document is no longer relevant, or its designation has changed" - http://www.standards.org.au/StandardsDevelopment/Developing_Standards/Pages/Withdrawing-Standards.aspx	Noted. This reference has been removed.
28.	8.8.(11)	Would consider an inboard petrol boat dealer would be the appropriate persons to complete these checks. Would not think a licenced electrician would be the best person to perform the checks.	Noted. The requirement for the inspection to be carried out be a licenced electrician has been removed. The intent being that where wiring appears to be deteriorated in any way, it is either replaced/repaired or tested to ensure the safety of the vessel.
29.	7.1 (a)	Not sure why the NSCV Fire section is re-introduced due to all the problems and comment on this standard. The requirements between the NSCV and ISO are miles apart. I assume the NSCV can be used for equivalence to the	Noted. NSCV C4 is currently being reviewed with a view to simplification. The intention is to ensure that vessels constructed in accordance with NSCV Part C are able to comply with Leisure craft standard without modification.

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		'like for like" fire requirements listed in ISO, i.e. fire extinguishers, fixed firefighting systems?	This is most relevant for those vessels operating in multiple classes (e.g. 2C / 4C craft.).
30.	Chapter 6 Structure 6.2 (2)	The bending moment alone is not sufficient in itself. The cross deck structure needs to comply with either the standard used to determine the hull scantlings or the standard used to determine the superstructure scantlings,	The standard proposed in the draft reflects a culmination of past approaches by state and territory marine safety agencies and also aligns to the current approach in the NSCV Part F2.
31.	4.8 (4)	Again a houseboat and a yacht on the same waters with the same risk profile have two different outcomes for guardrail heights. Would recommend the requirements are consistent and the 600mm is adopted as the standard height.	Noted. The intention is to generally align to the BCA and work health and safety (WHS).
32.	Table 6 and Table 7	Would recommend the acceptance of basic flotation for D and E waters where the monthly temperature is > 15 degrees. This risks associated with flotation and for operations drowning are substantially less than ocean service and waters.	This has been consulted on widely and the resulting options reflect a graduated approach to achieving the flotation outcome.
33.	Houseboats	Woke up thinking about two items that came into the SA requirements as a result of fatalities years ago. One is the need to ensure that no-one sleeps in a space that is heated by an unflued gas heater the second is a requirement to have open cross ventilation in houseboats- we used to stipulate a minimum area again related to gas safety. Remember a gas appliance may be added after build. Haven't re-read but if it's already in apologies-otherwise suggest you include.	A criteria has been added relating to LPG for gas appliances. That will give effect to the following: Liquefied petroleum gas installations for appliances must comply with NSCV Subsection C5C. *Note1* NSCV Subsection C5C requires gas appliances to be installed in accordance with AS5601.1. *Note2:* Any space used or intended to be used for sleeping including and combined living/sleeping areas are a bedroom for the purpose of AS 5601.1. AS5601.1 prohibits the installation of certain gas appliances such as un-flued gas heaters or heaters without flame safeguards within bedrooms.
34.	NSCV F2 draft 28 7 16	Overall our Association is satisfied with the draft in relation to the survey and safety requirements for new charter vessels. One recommendation: Table 3 the buoyant appliance calls for 30m of 8mm floating rope on all appliances plus a self-igniting light. Where two appliances are required, possibly one appliance with a rope and one appliance with a light may be easier to manage and quicker to deploy? Concerns are we have been unable verify from AMSA or MSQ the implication of the new draft on two issues: 1) The safety equipment requirements for our positive tenders. Will the exiting MSQ	The requirements for tenders are not contained within NSCV Part F2. The MSQ requirements ceased to have effect on 1 July 2013 for new vessels. However, for the most part 'existing vessels' are grandfathered and are able to continue operating in compliance with the standard that applied to that vessel on 30 June 2013. However, from 1 July 2016, all non-survey vessels were

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		requirements continue? (See attached document) 2) Table 10 4 Competency of Operators, will the existing MSQ state licence exemptions still apply to operators using vessels under 10 knots? (Any changes will have a significant impact on our operations)	required to carry equipment in accordance with NSCV Part G. Numerous submissions have been received relating to the previous Qld hire and drive standard that applied to vessels operating under 10 knots. The intention is to retain the ability for hirers to be able to operate Class 4 vessel under 10 knots without a recreational licence.
35.	Chapter 13 element 5	In relation to the age requirements and required qualifications to be a tour leader on a PWC we feel this is much more practical in your proposed draft. At current the requirement for a tour guide to have a coxswains grade 1 license is excessive. Not only is it excessive but we are unable to train new staff as our PWC's are under 5 meters so staff cannot acquire sea time. Also at current the minimum age for a pillion passenger is not to be under the age of 12. We see this is uncalled for as ourselves and many other operators I have spoken with have never had an incident with a parent or guardian riding with a pillion passenger under 12 years of age. We have found that parents or guardians riding with a child under 12 ride responsibly and see it good for the younger generations that they be taught about responsible driving. I also feel with the current age restrictions we are unable to cater for family's and therefore has taken away our ability to be selective during peak periods and avoid those we feel are more likely to push the boundaries and not respect the rules increasing the likeliness of an incident.	Noted. Thank you for your submission.
36.	Draft Submission	Our submission is attached.	See below responses to each comment.
37.	0	Please see attached document for our Association submission.	See below responses to each comment.
38.	General	See response uploaded (See subsequent submissions from uploaded document)	See below responses to each comment.
39.	Overall Document layout Chapter 13	It would be preferable to have chapter 13 published as a separate part so it can more readily be used in conjunction with Part G for the many stakeholders dealing with just Scheme NS class 4 vessels.	Noted. A review of Marine Order 504 (Certificates of operation—national law) is currently being progressed - the outcome of which may remove the entire operational chapter from this Part and locate it with the other operational requirements (currently in Part E).

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	Operational requirements		
40.	Overall Document layout Schedule 1 Required outcomes	It would be preferable to have schedule 1 published as a separate part. This will only really be used by persons wishing to apply for an equivalent solution which should be a seldom occurrence if the deemed to satisfy part of the standard is appropriate.	Noted. The intention is for NSCV Part F2 to be as standalone as possible.
41.	1.3	A clause needs to be added pertaining to the use of referenced standards to the effect that a particular standard may only be utilised to the extent that the subject vessel is the kind of vessel and is within the length and power rating covered by the scope of that standard. i.e. AS1799 only deals with craft up to 15m so cannot be used on an 18m craft, and any other aspect that the standard may preclude from use. i.e., An outboard powered vessel may not utilise the ABYC to comply with BASIC flotation because the ABYC only contemplates the use of basic flotation on vessels with inboard engines. The nature of the ISO standard also requires that ISO is used for stability, buoyancy and watertight integrity. It is potentially dangerous to use parts of the ISO standard in isolation.	Noted. Each clause that references a standard provides that it is used as applicable to the vessel.
42.	Table 1 Standard Houseboat Anchor with chain and rope	Need to include the requirement for an anchor ball day shape where the there is a need to carry an anchor, i.e., in tidal waters. – Or be clear that the day shapes of the ColRegs are not required in specified waterways.	Noted.. These requirements are not mentioned in the current standard, and as such have been maintained in the revised standard
43.	Table 1 Standard Houseboat Buoyant appliances	The buoyant rope should only be required on the second life ring where the buoyant light is not attached. 30 meters of rope and a light attached to a lifebuoy makes it cumbersome and impedes it's deployment. 30 meters is too long. It need only be the length of the vessel but not less than 15 meters.	Noted. The requirement for the second life ring has been removed in response to other submissions. The length of line has been retained at this time.
44.	Table 1 Standard Houseboat	The one size fits all approach of 2 x 4.5kg dry chemical fire extinguisher is not appropriate for the range of house boat sizes. A single level 15m by 6m houseboat probably only needs one extinguisher. A two level 24m by 8.5m	Noted. The clause has been retained as per the consultation draft to provide a minimum quantity of extinguishers, noting that the section also requires the

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	Fire Extinguisher	houseboat may need three or four. e.g. “Dry powder fire extinguishers with total agent content of not less than 4.5kg for each 100 square meters of accommodation space”	owner to consider whether additional safety equipment is required based on the vessel and its operation.
45.	Table 1 Standard Houseboat Navigation Lights	Houseboat hirers are at the lower spectrum of skill level, unlicensed and most likely not interacting with other vessel types. The draft F2 requires full COLREGS nav lights (which includes NUC lights etc) on houseboats whereas later in the standard you are requiring only partial compliance with COLREGS nav lights on vessels that are more likely to be driven by more skilled & licensed persons interacting with other vessel types. It would be better to use this text taken from table 2: If operating at night or in restricted visibility: (a) for a vessel <12 m — 360 degree white light with port and starboard sidelights; and (b) for a vessel ≥12m — 360 degree white light with port and starboard sidelights, and masthead light and stern light	Noted. As Houseboats operate overnight they are required to have navigation lights.
46.	Table 1 Standard Houseboat	There is an increased use of inverters to eliminate the use of dual wiring and you should not be precluding the use of superior detection systems linked to a master control station. Suggest the following amendment “Smoke detectors are to be hardwired into the AC or DC supply and incorporate a reserve battery back-up. Detectors are to be located outside each sleeping cabin (one detector may serve multiple cabins where they are grouped together) and within internal stairwells.”	Noted. The clause has been updated to reflect the requirements in AS 3786.
47.	Table 2 Vessels in operational area E other than Standard Houseboats Anchor with chain and rope	Anchor ball day shape is required for vessel >7 meters – or make it clear that there this is not required.	Noted. These requirements are not mentioned in the current standard, and as such have been maintained in the revised standard
48.	Table 2 Vessels in operational area E other than	The buoyant rope should only be required on the second life ring where the buoyant light is not attached. 30 meters of rope and a light attached to a lifebuoy makes it cumbersome and impedes its deployment.	Noted. This aligns with the recent review of NSCV Part G.

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	Standard Houseboats Buoyant appliances	30 meters is too long. It need only be the length of the vessel but not less than 15 meters.	
49.	Table 2 Vessels in operational area E other than Standard Houseboats Distress Signals	The term “remote enclosed sheltered waters” is unable to be determined. “sheltered waters” is defined by NSCV as all D and E waters. “enclosed” in Victoria are specific and declared by state legislation and don’t necessarily align with sheltered waters. “remote” has not been defined. Putting all three terms together makes it completely ambiguous as to what circumstance the requirement applies.	Noted. This term is now defined to clarify the intent.
50.	Table 2 Vessels in operational area E other than Standard Houseboats EPIRB	An EPIRB should be permitted as an alternative to distress flares. Flares are not permitted by local laws around many remote inland locations due to the bushfire risk. An EPIRB is the more appropriate control for remote locations. The definition of “land” implies the use of EPIRBS only relates to tidal waters i.e. “above the ordinary high water line at spring tides” this creates ambiguity in locations were waters may be intermittently tidal due to runoff water levels and shifting sand bars etc. EPIRBS should be mandated for waters >2nm from the coast but be preferred alternative to flares for all other waters.	Noted. The option to carry an EPIRB in lieu of distress signals has been incorporated where distress signals are prohibited in the area of operation.
51.	Table 2 Vessels in operational area E other than Standard Houseboats Fire Extinguisher	Replace the comma in subclause b with “or” (b) the quantity and type of fire extinguisher mentioned in AS 1799.1:2009 or ISO 9094:2015	Noted. This clause has been updated to remove reference to ISO 9094.
52.	Table 2 Vessels in operational area E other than Standard Houseboats	Class 4 non houseboat vessel hirers are at the upper spectrum of skill level, possibly licensed and likely to be interacting with other vessel types. You are requiring only partial COLREGS nav lights on these vessels whereas earlier in the standard you are requiring full compliance with COLREGS nav lights on houseboats. It would be better to use this text taken from table 1	Noted. The clause has been updated to clarify the intent.

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	Navigation Lights	As required by the International Regulations for the Prevention of Collisions at Sea Convention, 1972 where the vessel is operating from sunset to sunrise or in restricted visibility Note Where a vessel is at anchor overnight (and not on a mooring), the COLREGS require a 360 degree white anchor light to be displayed. Vessels >12m require NUC lights	
53.	Table 2 Vessels in operational area E other than Standard Houseboats Sound signals	A efficient sound signal is required in order to comply with colregs.	Noted. These requirements are not mentioned in the current standard, and as such have been maintained in the revised standard.
54.	Table 3 Vessels operating in area D Anchor with chain and rope	Anchor ball day shape is required for vessel >7 meters Full set of day shapes required for vessel over 12 meters – or make it clear that they are not required.	Noted. These requirements are not mentioned in the current standard, and as such have been maintained in the revised standard.
55.	Table 3 Vessels operating in area D Buoyant appliances	The buoyant rope should only be required on the second life ring where the buoyant light is not attached. 30 meters of rope and a light attached to a lifebuoy makes it cumbersome and impedes it's deployment. 30 meters is too long. It need only be the length of the vessel but not less than 15 meters.	Noted. This aligns with the recent review of NSCV Part G.
56.	Table 3 Vessels operating in area D Distress signals	The term "remote enclosed sheltered waters" is unable to be determined. "sheltered waters" is defined by NSCV as all D and E waters. "enclosed" in Victoria are specific and declared by state legislation and don't necessarily align with sheltered waters. "remote" has not been defined. Putting all three terms together makes it completely ambiguous as to what circumstance the requirement applies. Or do you mean; "either; sheltered, enclosed or remote waters"?	Noted. This term is now defined to clarify the intent.

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		For area D waters it is more appropriate to have 2 handheld orange smoke and 2 handheld red flares for DCV leisure craft, regardless of whether the waters are considered “remote” or the distance from land. i.e., aligned with the recreational craft requirements. (note; for DCV’s with multiple classes, the carriage of 3 rocket, 2 h/h red and 1 orange smoke is superior to and therefore acceptable also, i.e. they wouldn’t need to carry an additional orange smoke)	
57.	Table 3 Vessels operating in area D EPIRB	An EPIRB should be permitted as an alternative to distress flares. An EPIRB is the more appropriate control for remote locations. EPIRBS should be mandated for waters >2nm from the coast but, in the case of leisure craft, the preferred alternative to flares for all other waters.	Noted. The option to carry an EPIRB in lieu of distress signals has been incorporated where distress signals are prohibited in the area of operation.
58.	Table 3 Vessels operating in area D Fire Extinguisher	Replace the comma in subclause b with “or” (b) the quantity and type of fire extinguisher mentioned in AS 1799.1:2009 or ISO 9094:2015	Noted. This clause has been updated to remove reference to ISO 9094.
59.	Table 3 Vessels operating in area D Navigation Lights	Class 4 non houseboat vessel hirers are at the upper spectrum of skill level, possibly licensed and likely to be interacting with other vessel types. You are requiring only partial COLREGS nav lights on these vessels whereas earlier in the standard you are requiring full compliance with COLREGS nav lights on houseboats. It would be better to use this text taken from table 1 As required by the International Regulations for the Prevention of Collisions at Sea Convention, 1972 where the vessel is operating from sunset to sunrise or in restricted visibility Note Where a vessel is at anchor overnight (and not on a mooring), the COLREGS require a 360 degree white anchor light to be displayed. Vessels >12m require NUC lights	Noted. The clause has been updated to clarify the intent.

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60.	Table 3 Vessels operating in area D Sound signals	A efficient sound signal is required in order to comply with colregs.	Noted for consideration. These requirements are not required or mentioned in the current standard.
61.	Table 4 Vessels operating in area C Anchor with chain and rope	Anchor ball day shape is required for vessel >7 meters Full set of day shapes required for vessel over 12 meters – or make it clear that they are not required.	Noted for consideration. These requirements are not required or mentioned in the current standard.
62.	Table 4 Vessels operating in area C Buoyant appliances	The buoyant rope should only be required on the second life ring where the buoyant light is not attached. 30 meters of rope and a light attached to a lifebuoy makes it cumbersome and impedes it's deployment. 30 meters is too long. It need only be the length of the vessel but not less than 15 meters.	Noted. This aligns with the recent review of NSCV Part G.
63.	Table 4 Vessels operating in area C Distress signals	The term "remote enclosed sheltered waters" is unable to be determined. But I'm guessing it does not even apply to this table (area C waters) 3 rocket flares, 2 h/h red and 1 orange smoke to be carried at all times.	Noted. This term will now be defined to clarify the intent.
64.	Table 4 Vessels operating in area C Fire Extinguisher	Replace the comma in subclause b with "or" (b) the quantity and type of fire extinguisher mentioned in AS 1799.1:2009 or ISO 9094:2015	Noted. This clause has been updated to remove reference to ISO 9094.
65.	Table 4 Vessels operating in area C	Column 1 should state "Life raft and/or dinghy" Column 2 should state "for the 100% complement of persons if the vessel does not have level flotation in accordance with Option 1 of table 6"	Noted. The requirement has been removed from the equipment tables and retained only in the flotation chapter.

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	Life raft or dinghy	The requirement should be able to be achieved with multiple appliances	
66.	Table 4 Vessels operating in area C Map or chart of operational area	A map should only be permitted if the vessel is restricted to tight geographical limits, otherwise a chart must be carried	Noted. Charts and maps have both been commonly permitted for these kinds craft and have been retained as per current requirements.
67.	Table 4 Vessels operating in area C Navigation Lights	Class 4 non houseboat vessel hirers are at the upper spectrum of skill level, possibly licensed and likely to be interacting with other vessel types. You are requiring only partial COLREGS nav lights on these vessels whereas earlier in the standard you are requiring full compliance with COLREGS nav lights on houseboats. It would be better to use this text taken from table 1 As required by the International Regulations for the Prevention of Collisions at Sea Convention, 1972 where the vessel is operating from sunset to sunrise or in restricted visibility Note Where a vessel is at anchor overnight (and not on a mooring), the COLREGS require a 360 degree white anchor light to be displayed. Vessels >12m require NUC lights	Noted. The clause has been updated to clarify the intent.
68.	Table 4 Vessels operating in area C Sound signals	A efficient sound signal is required in order to comply with colregs.	Noted. These requirements are not mentioned in the current standard, and as such have been maintained in the revised standard
69.	3.5(2)	“Safety equipment carried on board a vessel must be replaced or serviced if it exceeds the manufacturer’s specified expiry date.”	Noted. This is the intent.
70.	3.6(1)	The following safety equipment must be marked to identify the vessel to which it belongs: (a) lifejackets; (b) life rafts; (c) buoyant appliances;	Noted. The clause has been updated to include dinghies.

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		(d) lifebuoys; (e) dinghy.	
71.	Chapter 4 (19)	The means of embarking a vessel must take INTO account - rather than in account	Noted. This has been corrected.
72.	Chapter 6 Structure 6.1	For clarity, it should be noted that that the length limits and robust or light duty applied in NSCV Part C3 should not apply to a craft constructed to solely operate in a class 4 category. The equivalent design categories from NSCV Part C3 table 5 do apply however	Noted. This has been clarified.
73.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.8 (11)	what sort of test? It needs to be specified.	Noted. The intention is that where deterioration is evident the options are to repair/replace or testing. Where testing was undertaken it would include insulation resistance testing.
74.	Chapter 6 Structure 6.2 (3)	Permit the use of the same standard used to determine the hull if the designer wishes. BCA will not be relevant for some designs	The intention is that the BCA is used. Outside of the BCA, it would not be considered a standard houseboat.
75.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.2	Consider in NSCV part C 5A permitting the use of sheltered waters shaft factor for class C leisure craft. i.e., Part C 5A 3.10.2 where a = 1.053 may be used for class 4C	Noted. This aligns with the recent review of NSCV Part G.
76.	Chapter 8 Machinery, propulsion, exhaust, steering and	In order to prevent an inferior outcome, whichever standard is used for exhausts, the same standard should be used in chapter 5 water tight integrity and vice-versa. The two areas are interrelated.	Noted.

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	fuel 8.6		
77.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.6 (3)	In most cases a water lift muffler will be fitted to a wet system and in most cases they won't be able to "self-drain" overboard. Water lift mufflers are typically fitted below water line and require anti-syphon breakers on the cooling water supply before the muffler. There will always be residual water sitting in the muffler when the engine is not running.	Sub clause (3) has been deleted.
78.	Chapter 8 Machinery 8.8 Inboard Petrol Engines	MSV believe that the regulatory settings proposed by AMSA to permit the use of inboard petrol engines do not address what is being sought by industry. As F2 covers only those hire and drive vessels that do not fall within the scope of EX02 & Part G, thereby requiring some level of inspection, we agree that both initial and on-going inspection is required. However the majority of industry that ask about the use of inboard petrol engines are ski and wake boarding schools. We believe this operation clearly to be a class 2 operation, therefore there is no avenue for them to comply. We have seen certification issued by other states that appear to permit a class 4 vessel to be used in a class 2 operation and do not agree that such use is a correct application of the national law particularly when considering who is in charge of the vessel. We proposed earlier in the F2/G consultation that inboard petrol engines would be better dealt with by creating a new part 5E that deals exclusively with both the installation and specific maintenance/inspection requirements of inboard petrol installations and be restricted to <7.5m. Such vessels would be survey level 2 under NSAMS requiring certification, full initial and specific periodic survey. Under the currently proposed F2, the buoyancy requirements will preclude inboard petrol powered ski/and wake board vessels from being a practical or viable proposition.	Noted. The intention is that the inboard petrol provisions would also be consequentially incorporated into NSCV Part C5A, thereby allowing them to be used for Class 2 operations like water-ski and wakeboard operations.
79.	Chapter 8.8 1 b)	The vessels that have currently been accepted are greater than 300kw in engine power.	This is the figure developed in consultation with the NSCV Part F2/Part G reference group and as a result of submissions received during public consultation.

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80.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.8 (5)(c) (ii) (A) (II)	Improve wording, suggest the following; "have sufficient capacity to effect a complete air change for the volume of air in the bilge within 15 seconds".	The petrol inboard section will be updated to reflect ISO 11105 requirements directly.
81.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.8 (5)(c) (ii) (B)	Mention is made of a bilge blower and an extraction fan. Then there is a reference to a fan. Is there intended to be two fans/ blowers and what runs for 60s?	The petrol inboard section has been updated to reflect ISO 11105 requirements directly.
82.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.8 (5)(c) (ii) (D)	It is not yet stated that an automatic fan is required in preference to a manual fan. You need to include a previous clause requiring an automatic fan.	This section has been updated to reflect ISO and ABYC requirements for inboard installations.
83.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.8 (9)(d)	Suggest; "Fuel piping made of rigid metallic seamless tube or pipe, or flexible hose incorporating a braided metal sheath with crimped end fittings"	Noted. The clause has been updated to reflect this intent.
84.	6.2 (2)	The requirement to withstand a bending moment of the full displacement is difficult for houseboats. Would recommend this subsection is worded into an advisory for designers to note and be aware of cross structure design	Noted.

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85.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.9	This clause needs to go into further detail i.e. “the supply of fuel needs to be shut off. i.e. by valve at the tank. if a solenoid valve is used then it must be the energized to remain open type”	Noted. The means provided must be manual and mechanical. Energised to remain open would not be an acceptable solution.
86.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.11 (2)	This clause is poorly worded and there is no criteria for the more dangerous alternate case. “There must be a fuel shut off valve fitted to the delivery line of any permanently installed fuel tank before the attachment of any flexible hose. Where a vessel has an underdeck fuel tank, sealed in a vapour tight cofferdam, and there is no potential source of ignition nearby, the fuel shut off valve may be fitted at the fuel filter inlet or if the fuel filter meets a fire protection standard at the outlet.”	Noted. This clause has been updated to provide further clarity.
87.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.11 (3) & (4)	A one size fits all approach is not appropriate for fuel hoses. Whilst flexible hoses in permanently installed parts of the fuel system need to meet a standard with a fire rating component. It is reasonable to permit the use of OEM flexible hose (which is typically only an SAE 30R7 standard) between an outboard and portable fuel tank or between the outboard and an externally mounted fuel filter (i.e., not more than 1.5 meters of hose).	Noted. This clause has been updated to provide further clarity.
88.	Chapter 8 Machinery, propulsion, exhaust, steering and fuel 8.13	It is worth to noting that Non metallic fittings may not be used in high fire risk spaces.	NSCV Part C5A doesn't allow plastic skin fittings, however the intention is that a vessel of the nominated categories (i.e. leisure craft) that comply with the RCD/ISO would be able to be imported with as few modifications as possible.
89.	Chapter 10 , 10.1	Sched 3 does not appear to deal with stability or deck height, but only reserve buoyancy.	Noted. Intact stability requirements have been included in the draft.

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90.	Chapter 10 Buoyancy, stability, loading and flotation 10.2 (3)	It is not helpful to refer to decks when dealing with pontoon style houseboat stability. Top of pontoon should be the term used to prevent perverse measurements being taken.	Noted. The clause has been updated to reflect this intent.
91.	Chapter 10 Buoyancy, stability, loading and flotation 10.2 (4)	Suggest; "The line mentioned in subsection (3) (the margin line) must be not less than 75mm below the highest point of the enclosed buoyant volume at any point along the length of the hull".	Noted. The clause has been updated to reflect this intent.
92.	Table 6 <6m length Option 1	The words LEVEL flotation should be capitalised and bold to stand out to the reader. It is also worth to noting; (1) ABYC level flotation only applies to vessels powered with outboard engines (2) ISO 12217-3 option 1 is the only option that requires level flotation	Noted. (1)The ABYC level flotation criteria doesn't exclude inboard vessels. The standard itself includes a number of examples of how it should be applied to vessels with stern drives and jets. (2) We agree that ISO 1227-3 option 1 is the only option that requires level flotation for a vessel otherwise designed in accordance with ISO 12217-3. They will either be non-compliant or fall under options 2 or 3 of the buoyancy table in NSCV F2 (for boats with basic flotation – option 6)
93.	Table 6 <6m length Option 1	ABYC modified level flotation can only be used within the scope of its applicability within ABYC i.e., less than 1.5kW or manually propelled, It is extremely unlikely that a non-survey scheme NS class 4 vessel will fit within those parameters. Should be removed.	Noted. The modified criteria will only be retained the corresponding table in NSCV Part G.
94.	Table 6 Options 2 & 3	On the specific feedback sought regarding wearing of lifejackets on 6m to 7.5m vessels that don't have level flotation. We reinforce that Victoria's Marine legislation imposes life jackets to be worn on all hire and drive vessels <4.8m at all times and on those hire and drive vessels 4.8m-12m in length during times of heightened risk – this includes boating alone. Lifejackets are particularly useful for people who suddenly and unexpectedly enter the water. This can occur on any style of vessel regardless of what	Noted. The standard has been updated to provide that the **wearing** of lifejackets is to be in accordance with the recreational laws of the state/territory that the vessel is operating in. The mandatory wearing of lifejackets will also be retained in the flotation table **where option 3 is used to achieve the flotation outcomes**, irrespective of the state/territory laws.

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		level of floatation is fitted. MSV support mandatory wear on these 6-7.5m vessels.	
95.	Table 6 <6m length Option 2	Table 6 <6m length Option 2 There are no requirements for a dinghy; The dinghy must in turn meet the requirements for level flotation The use of a dinghy should only be permitted as a life saving device in D or E waters, not C waters.	Noted. The requirements for life rafts and dinghies are contained in Schedule 2 and have been updated to refer back to the requirements in NSCV Part C7A.
96.	Table 6 <6m length Option 2	The words BASIC flotation should be capitalised and bold to stand out to the reader. It is also worthy to note; (1) ABYC basic flotation only applies to vessels powered with inboard engines (2) ISO 12217-3 option 6 is the only BASIC flotation option.	Noted. See above comment regarding option 1 level flotation.
97.	Table 6 Option 3	On the specific feedback sought regarding buoyant appliance use where the mean monthly temperature is 15 degrees or more. The implementation of this in D and E waters will be problematic because there is no comprehensive source of water temperature data for lakes, rivers dams etc. The water temperatures in these areas are highly variable due to many contributing environmental factors. The proposal to replace this requirement with a risk assessment is a far better approach. Despite this MSV believe that the regulatory settings proposed by AMSA do not address what is being sought by industry. Buoyant appliances in lieu of either basic or level flotation would address the issue in small class 2D/2E workboats that because of additional equipment fitted to the vessel, the additional buoyancy material required to support the additional weight makes the vessel un-usable – i.e. electro-fishing The buoyant appliance option should be permitted in Part G for those vessels that don't carry passengers. In any use of a vessel primarily involving the carriage of passengers, there is no impediment to fitting either basic or level flotation so we don't see a need to address it in Part F2.	Noted. The water temperature requirement will be replaced by an operational risk analysis so that other factors can also be addressed when considering the flotation options. The options for flotation have resulted from 3 rounds of public consultation and 3 reference group meetings and are aimed at providing increased flexibility for industry.
98.	Table 6 <6m length Option 3	The words BASIC flotation should be capitalised and bold to stand out to the reader. It is also worthy to note; (1) ABYC basic flotation only applies to vessels powered with inboard engines (2) ISO 12217-3 option 6 is the only BASIC flotation option.	Noted. See above comment regarding option 1 level flotation. References to 'basic' and 'level' flotation will be bolded in the final drafts.

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99.	Table 6	The arrangement of table 6 creates ambiguity in the requirements for many vessels. The requirements for decked, well decked or fully enclosed vessels is not clear enough. Suggest that the table incorporate the buoyancy requirements with the stability and watertight integrity from previous chapters as they are all interrelated.	Noted.
100.	Table 11 Row 3 Buoyant appliance	The buoyant rope should only be required on the second life ring where the buoyant light is not attached. Remove text from column 2 and place the requirement in column 3 You should also include a requirement for a grab rope to be attached around the perimeter.	Noted.
101.	Chapter 10.2	The intact stability criteria for standard houseboats has been removed and only half of the flooded criteria is included. The margin line is used to determine flooded compliance but you need to state that the most onerous compartment has been flooded. The intact criteria that is missing is to apply an appropriate heeling moment and still maintain at least 25% of the upright freeboard. The 25% reserve buoyancy is the measure to ensure there is in fact sufficient upright freeboard in the first place and also to ensure that 1200mm bulkhead spacing is a deemed to satisfy the flooded condition without doing a comprehensive analysis. The criteria as written in the draft is insufficient to ensure safety of every houseboat. USL section 18 and the current F2 has been diluted to such an extent in the consultation draft that it is now ineffective.	The standard has been amended to capture the additional criteria.
102.	Chapter 12. 12.7	Is there now a 2014 version of 6185?	Only ISO 6185-3 was amended in 2014.
103.	Chapter 13	The full extent of Ch 13 is quite complex and appears to be all inclusive of Part E for what will be normally be a quite simple operation. Perhaps Ch13 could be scaled to accommodate off the beach sail boats and H&D tinnies.	Noted. Guidance on Class 4 SMS are available on the AMSA website and SMS workshops have been running Nationally for some time. It is envisaged that simpler, less complex operations would not need to consider all of the matters mentioned in Chapter 13, however more complex vessels or operations would need to consider all the items mentioned along with any additional

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			matters identified as part of the owner/operators risk assessment.
104.	Schedule 2	Life raft std is ISO 9650-1 not 9050-1.	The reference to the standard has been amended to refer to NSCV Part C7A.
105.	Schedule 3	One of the objectives of the standard is to provide an easy to use and clear guidance on how to comply with the requirements. Schedule 3 is overly complicated for a set of simple geometric shapes, the 25% is a constant. It would be far simpler to determine what is 25% of the total cross section and express the result as a percentage of the total depth that must not be immersed for each shape.	Noted. Whilst this could be implemented for some simple shapes such as the cylinder that only have one variable (diameter). It is not possible for other shapes that have more than one variable. For example the amount of freeboard remaining @ 25% reserve buoyancy remaining for the 5 sided shape is dependent on the proportion of "height of the side face" to the "overall height".
106.	10.4.3 (CURRENT)	Participant Age and Competence "œ The provider of a leisure craft shall not allow the user to take control of the personal watercraft unless all participants, including pillion passengers are over the age of 12 years" Magnetic Jet has been in operation since 1996, taking families with children aged from 8 years and up. We have also taken deaf, blind and handicapped passengers on occasion. As a result we have had no incidents involving parental guardians carrying pillion passengers aged 8"“12 years, as a result of a change in this legislation in QLD this will; Â· Greatly reduce the amount of families that currently enjoy the experience of our guided tours. Â· Reduce the opportunity of parents and guardians to set an example of safe and enjoyable jet skiing to their children. Â· Impact directly on the QLD Hire and Drive Industry, in particular Magnetic Island is known as a family friendly destination. The change of legislation impacts our business in a number of areas; Â· Families with multiple children generally have at least one child between 8-12 years. From our experience if one can't go, no-one goes. Â· For many years we have had a great relationship with an organization called Fathering Adventures that regularly book out our tours. This would be threatened with the age restrictions. Educating children at an early age on water safety and safe operation of personal water craft would be diminished. Magnetic Jet operates in GBRMP and the obligation to our permit requirements also involve educating participants about marine life and respectfully interacting with them, this would also be greatly diminished for families with children 8-12 years. The adrenalin junkie element ceased with the restriction to the 30 knot	Thank you for your submission on the current NSCV Part F2. As per the above earlier response, the updated standard will provide for persons under 16 years of age to be able to participate so long as a pillion over the age of 16 years is on board and able to take control of the PWC.

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		speed limit; a proven improvement to Hire and Drive operation. Magnetic Jet do not take online bookings, therefore speak directly to our customers so they know how we operate, no free-styling, spinning, sharp erratic turns, fish-tailings etc. these actions are what give PWCs a bad reputation that most people perceive. These type of dangerous operations should be legislated and banned from Hire and Drive Operations. PWC"™s for us are a mode of transport to conduct a guided scenic tour, suitable for ages 8-80. Improvements to PWCs over the last ten years have made great steps to customer safety; e.g. IBR (Braking System), collision avoidance function, handle bar adjustment, hull stability and boarding steps, seat straps and side handles. These improvements combined with the standard required briefings now undertaken, both practical and verbal, the obligation for customers to fully understand and acknowledge verbally and physically prior to departure, have also enhanced the experience for adults and their children.	
107.	Chapter 13 (Draft)	Thanks for the reply to our submission it seems a bit of misinformation has been doing the rounds! After reading thru the new proposal, which I admit at first was mind numbing (ha ha) the chapter 13 certainly addresses our concerns in regards to age requirements, everything else seems to be as we operate currently, thanks again Pete.	We are pleased that the draft provides clarity on this matter.
108.	10.4.3 (CURRENT)	Part F Section 2 Chapter 10.4.3: Participant Age and Competence "˜The Provider of a leisure craft shall not allow the user to take control of the personal water craft unless- *all participants, including pillion passengers, are over the age of 12 years"™ We have operated for 16 years taking pillion passengers 8-12 years of age and we have found these skis have been operated the safest. As a result we have had zero incidents involving parental guardians carrying pillion passengers aged 8 "“ 12years As a result of the change in legislation this will: ' Increase the likelihood of incidents due to restricting our ability to be selective in peak seasons due to high volume of families occupying our bookings (our experience identifying and turning away the potential trouble makers) ' Diminish the opportunity for parents to set an example of safe operation on the water for "future generations" ' This will involuntarily shift our audience from safe operating families to "˜Adrenaline Junkies"™ which from experience are much more difficult to control, less respect for guides and general hire and drive practice ' This will have a	Thank you for your submission on the current NSCV Part F2. As per the above earlier response, the updated standard will provide for persons under 16 years of age to be able to participate so long as a pillion over the age of 16 years is on board and able to take control of the personal watercraft (PWC).

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		significant impact on the Gold Coast Tourism Industry in regards to PWC hire and drive for young families.	
109.	10.4.3 (CURRENT)	The change of legislation impacts our business in a number of areas: 1) The Briefing Room (Theoretical) ' Participants obtaining the role as parental guardian are aware of their liability and we have found they pay extra attention during the briefing, have the highest first pass rate in the written test and are more likely to ask questions ' "˜Adrenalin Junkies"™ are less likely to absorb information during the safety briefing. This is shown through their first test results and their arrogance on the water ' Safe operating families who have the integrity to over compensate in operating safely to ensure the safety of their child (maternal instinct) ' The ability to educate and set a standard for youth between the age of 8-12 about water safety e.g. the rules for preventing collision at sea and the legal obligations for being a captain of a ship 2) In the field (Practical) ' During the 16 years of operational experience, we have found parental guardians operate the safest and ensure they apply their theoretical knowledge in the field ' Increase of risk of incidence as a result of restricting our ability to be selective in our customer audience We would lose the ability to demonstrate best practice on the water and set an example to kids aged 8-12 about safe operation Compliance and alternative arrangements we propose to implement to maintain the safety of the vessel or persons on board: ' Provide a higher ratio of guides than of that stated in NSCV Part F Section 2 to ensure constant observation and to maximise safety ' All of our skis have saddle straps, seat handles and handles on our life jackets for the kids to hold onto (Re-inforced in briefing) ' We have found that all 8 year olds are tall enough to place their feet in the foot well adding additional points of contact for them to secure themselves. We have a jet ski outside our shop which is a pre-requisite for all children coming on our safaris. They need to be able to be seated on the ski and their feet be grounded in the foot well to qualify as being able to apply a minimal 3 points of contact at all times (WHS Act 2011) ' Safety Briefing: reinforce points of contact, verbal communication between guardian and child and the dangers associated with carrying a passenger which is currently emphasised in the safety briefing (e.g. fish tailing is prohibited) ' Our written test that all participants are required to complete and pass 100% will have additional questions about the added responsibility when taking someone of age Proposed amendments to the Act: ' A pre-requisite standard for children minimum age of 7 years old to be able to be seated on the ski and their feet	Thank you for your submission on the current NSCV Part F2. As per the above earlier response, the updated standard will provide for persons under 16 years of age to be able to participate so long as a pillion over the age of 16 years is on board and able to take control of the PWC.

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		be grounded in the foot well ' Driving age restrictions be lifted to 14 years old to drive with a parental guardian on the back of the Jet Ski ' Self-drive age of 16 years to remain as per current regulation	
110.	10.4.3 (CURRENT)	"˜The Provider of a leisure craft shall not allow the user to take control of the personal water craft unless- *all participants, including pillion passengers, are over the age of 12 years"™ I have been operating in the commercial marine industry for over 20 years taking pillion passengers 8-12 years of age and I have found these skis have been operated the safest. As a result I have had zero incidents involving parental guardians carrying pillion passengers aged 8 "“ 12years As a result of the change in legislation this will: Increase the likelihood of incidents due to restricting our ability to be selective in peak seasons due to high volume of families occupying our bookings (our experience identifying and turning away the potential trouble makers) Diminish the opportunity for parents to set an example of safe operation on the water for "future generations" This will involuntarily shift our audience from safe operating families to "˜Adrenaline Junkies" which from experience are much more difficult to control, less respect for guides and general hire and drive practice " This will have a significant impact on the Marine Based Tourism Industry in regards to PWC hire and drive for young families. The change of legislation impacts our business in a number of areas: 1) The Briefing Room (Theoretical) " Participants obtaining the role as parental guardian are aware of their liability and we have found they pay extra attention during the briefing, have the highest first pass rate in the written test and are more likely to ask questions "˜Adrenalin Junkies" are less likely to absorb information during the safety briefing. This is shown through their first test results and their arrogance on the water " Safe operating families who have the integrity to over compensate in operating safely to ensure the safety of their child (maternal instinct) " The ability to educate and set a standard for youth between the age of 8-12 about water safety e.g. the rules for preventing collision at sea and the legal obligations for being a captain of a ship 2) In the field (Practical) During my 20 years of operational experience, I have found parental guardians operate the safest and ensure they apply their theoretical knowledge in the field " Increase of risk of incidence as a result of restricting our ability to be selective in our customer audience " We would lose the ability to demonstrate best practice on the water and set an example to kids aged 8-12 about safe operation Compliance and alternative arrangements we propose to implement to maintain the safety of the vessel or persons on	Thank you for your submission on the current NSCV Part F2. As per the above earlier response, the updated standard will provide for persons under 16 years of age to be able to participate so long as a pillion over the age of 16 years is on board and able to take control of the PWC.

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		board: " Provide a higher ratio of guides than of that stated in NSCV Part F Section 2 to ensure constant observation and to maximise safety " All of our skis have saddle straps, seat handles and handles on our life jackets for the kids to hold onto (Re-inforced in briefing) " We have found that all 8 year olds are tall enough to place their feet in the foot well adding additional points of contact for them to secure themselves. Prior to acceptance on our tour it is a pre-requisite for all children participating on our tours to be seated on the ski and their feet be grounded in the foot well to qualify as being able to apply a minimal 3 points of contact at all times (WHS Act 2011) " Safety Briefing: reinforce points of contact, verbal communication between guardian and child and the dangers associated with carrying a passenger which is currently emphasised in the safety briefing (e.g. fish tailing is prohibited) " Our written test that all participants are required to complete and pass 100% will have additional questions about the added responsibility when taking someone of age Proposed amendments to the Act: " A pre-requisite standard for children minimum age of 7 years old to be able to be seated on the ski and their feet be grounded in the foot well " Self-drive age of 16 years to remain as per current regulation	
111.	General layout	The whole document would be less complex if the need to refer to multiple sections was removed in favour of specific sections, i.e. Standard Houseboats.	Noted. The standard will be updated to provide for a specific houseboat chapter.
112.	Definition - Pg11 Stand Houseboat	Standard Houseboat means a houseboat that: (2) Is	Noted.
113.	Chapter 1, (7) Pg. 12	5th line Replace subdivision with compartment.	Noted. A compartment is the result of subdivision. The definition will be updated to provide 'compartment subdivision'.
114.	Chapter 2, pg13, 2.1(1)	Requirements for leisure craft the vessel must: (a) be	Noted.
115.	Ch. 3, Table 1, pg14	Buoyant appliance with 30m of 8mm buoyant rope attached. Suggest only 1 appliance is necessary. Self-igniting light was not part of the original schedule 8 and is considered not necessary for a standard houseboat.	Noted. The standard will be updated to reflect this intent.

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116.	Table 1 pg14-15	Smoke Alarms: Smoke Alarms are to be hardwired into the DC supply and contain internal battery back-up SUGGEST: or be self-contained with 10 year Lithium Battery	Noted. The clause will be updated to reflect the requirements in AS 3786.
117.	Ch. 3, Pg. 20, 3.5	3) (a) be authorised to service the equipment by its manufacturer; and This is unreasonable	Noted. This requirement will be removed.
118.	pg. 21 3.5(c)	Use genuine spare parts and materials; and This is unreasonable	Noted. This will be removed.
119.	3.8, pg. 21	This section doesn't make sense for Standard Houseboats which are constructed on pontoons with sealed air tight / water tight compartments. Although the vessel may be up to 24m long, the open compartments that are capable of being swamped are of less area than a dinghy. A suggestion for Standard Houseboats: A bilge pump must be located in all unsealed compartments. Bilge Pumps are to be Extra Low Voltage and operate automatically. Where a compartment contains equipment such as water cooled propulsion or auxiliary engines, through hole skin fittings below water line, or water pressure pumps, the bilge pump shall be capable of removing water at a rate greater than the maximum flow rate of the associated pump, and in any case, > 4.0KL/hr All other compartments shall have a bilge pump > 2.0KL/hr. It is recommended that discharge outlets from bilges are on the outward facing side of the pontoon.	Noted. The standard will be updated to reflect this intent.
120.	4.5	Page 24 (b) be labelled as a potable water tank Suggest "at the filler point"	Noted. The clause will be updated to reflect this intent.
121.	4.5 (c)	be accessible for periodic inspection and cleaning through a watertight manhole or watertight hand hole; and This is not possible as on a standard houseboat the water tank is strung below the deck in a pipe and is not accessible	Noted. This requirement will be updated and aligned with the NSCV Part C requirements.
122.	4.5(5), p25	Should the vertical course of a guard rail be 550mm vertical height to match the old survey requirements? The current draft states 600mm but it doesn't differentiate between a true vertical and a 30 deg incline. Figure 2 shows 600mm at a 30 deg incline which is 520mm at true vertical. SEE DIAGRAM minimum 600mm where indicated	Noted for consideration.
123.	pg27 means of reboarding	means of reboarding (a) Suggest swim deck @300mm is appropriate	Noted for consideration.

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124.	13.3	Operational requirements 13.3 Definitions (iv) is included in the total number of persons on board the vessel As the guide will not be staying on the houseboat this should read is not included in the total number of persons on board the vessel	Class 4 vessel as limited to a total number of 12 persons on board. The guide definition reflects that requirement.
125.	Schedule 1 - required outcomes	Revamping of Schedule 1 Safety Management System elements of NSCV F2 draft-150102C into Chapter 13 Operational requirements is inappropriate. What was a concise and specific (4 page) description of the SMS/P requirement has expanded to 15 pages of confused message, covering related but nevertheless individual topics. The mismatch is apparent in more than 2 pages of SM content without corresponding Operational requirements and, 4 pages of Operational requirements with no corresponding SM content. Even where ostensibly matched, many are incongruous with for instance, the general requirement for a risk assessment paired with prescriptive conditions for PWCs and Aerial freestyle devices? NSCV F2 Edition 1.0 specifies an SMP for Class 4 (Leisure craft or Hire & drive vessels) as distinct from the SMS for crewed vessels. This here appears to have been abandoned. It is much more than terminology semantics with the very fundamental difference between these two scenarios also appearing to have been lost. In Ed 1.0 the Risk assessment appeared to be a standalone document informing the SMS/P. Here (Element 3) in the SMS content column it appears to be an integral part of the SMS whereas under Operational requirements it still seems separate. Doesn't matter but consistency please. As elsewhere in this document, references to offshore procedures as if they apply across the board suggest insufficiently vetted copying from other sources. It is thus strongly recommended that Schedule 1 Safety Management system Plan elements and Schedule 3 Additional Safety Management system Plan elements "Class 4 vessels as in NSCV F2 draft-150102 be reinstated as a standalone section.	Noted. (1) The content is intended to reflect the requirements currently provided in NSCV Part E for Class 1, 2 and 3 vessels. (2) The are no SMS content requirements without operational requirements, it may appear that some sections have blank columns next to them, as numerous rows of the table are spread across multiple pages. (3) The risk assessment section (row 3) has a subsection specifically referring to Cruising area & Communications. The Additional operational requirements for PWC relating to cruising area will be moved down the row to line up with the subsection in column 2. (4) Part 3 (s12) of the National Law requires all operations to have a Safety Management System (SMS). The term Safety Management Plan has been replaced with SMS in this Part of the NSCV to align to the National Law. The risk assessment is a fundamental part of a SMS, in that it would likely be used to inform many of the aspects of the SMS (i.e. procedures, mitigation measures etc.), whilst also being an important component to undertake review and improvement of the operation and its SMS. (5) Offshore operations are referenced as Class 4 vessels are able to be certificated up to operational area C (Restricted Offshore operations). (6) As a part of a review of *Marine Order 504 (Certificates of Operation - national law) 2013*, consideration is being given to possibly relocate the content of both Part E and the operational elements

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			(Chapter 13) of Part F2 into a standalone operational section.
126.	10.4.3 (CURRENT #1)	"˜The Provider of a leisure craft shall not allow the user to take control of the personal water craft unless- *all participants, including pillion passengers, are over the age of 12 years" We have operated for 21 years (previous owner 13 years current owner 8 years) taking pillion passengers 6-16 years of age and we have found these skis have been operated the safest. As a result we have had zero incidents involving parental guardians carrying pillion passengers aged 6 “ 16 years in the 21 years of operation. As a result of the change in legislation this will: “Change the dynamics of a family friendly activity. By Restricting the age we will then have to change our marketing to cater for more adolescents. By doing this it increases the risk of the operation as we have found from experience that generally people who engage in risky behaviour are ages 18-25. Takes aways a fantastic opportunity for parents to set a good example for children, following instructions, conducting themselves in a safe manner and also encouraging our youth to take part safely in outdoor recreation activities. " This will involuntarily shift our audience from safe operating families to "˜Adrenaline Junkies"™ which from experience are much more difficult to control, less respect for guides and general hire and drive practice " Could have a Severe impact on our business, as it restricts a part of a niche market which caters for all ages/abilities over the age of 6. The change of legislation has a very real chance of doing serious damage to our business and could in turn result in loss of jobs in a unique environment. The change of legislation impacts our business in a number of areas: 1) Safety Briefings “People who engage themselves in dangerous or risky behaviours are generally easy to pick right from the start of the briefing. They show lack of attentiveness, respect, and general disregard to authority. These groups/individuals are monitored extremely closely. Through experience Parents and Guardians show the exact opposite of these attributes. They absorb all safety information, ask questions, show courtesy. Also when having parents/ guardians with children on tour, Other riders in group always display courtesy and respect with children and it make for a memorable and fun tour. " People in general tend to have a Natural or maternal instinct to take care of children and not put them in danger. This has been noticed and explains the such a good safety record within our business. 2) In the field (Practical) " During the 16 years of operational experience, we have found parental guardians operate the safest	Thank you for your submission on the current NSCV Part F2. As per our earlier response, the updated standard will provide for persons under 16 years of age to be able to participate so long as a pillion over the age of 16 years is on board and able to take control of the PWC.

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		and ensure they apply their theoretical knowledge in the field " By reducing the age this will also reduce the number of clients that adhere to the rules and guidelines set in place by our guides. In turn this will certainly increase the amount of drivers that will be more inclined to take risks and engage in dangerous behaviour (18-25 years of age). Not only will this increase the risk for our passengers but also for our guides. “We would lose the ability to demonstrate best practice on the water and set an example to kids aged 6-16 about safe water operations.	
127.	10.4.3 (CURRENT #2)	Compliance and alternative arrangements we propose to implement to maintain the safety of the vessel or persons on board: Provide a higher ratio of guides than of that stated in NSCV Part F Section 2 to ensure constant observation and to maximise safety " All of our skis have saddle straps, seat handles and handles on our life jackets for the kids to hold onto (Re-inforced in briefing) " We have found that most children over the age of 6-7 years of age are tall enough to place their feet in the foot well adding additional points of contact for them to secure themselves. We have a jet ski outside our shop which is a pre-requisite for all children coming on our tours. If the children can maintain 3 points of contact then that then complies with (WHS Act 2011). " Safety Briefing: reinforce points of contact, verbal communication between guardian and child and the dangers associated with carrying a passenger which is currently emphasised in the safety briefing (e.g. fish tailing is prohibited) Proposed amendments to the Act: " A pre-requisite standard for children minimum age of 7 years old to be able to be seated on the ski and their feet be grounded in the foot well " Driving age restrictions be lifted to 14 years old to drive with a parental guardian on the back of the Jet Ski " Self-drive age of 16 years to remain as per current regulation	Thank you for your submission. As per the above earlier response, the updated standard will provide for persons under 16 years of age to be able to participate so long as a pillion over the age of 16 years is on board and able to take control of the PWC.
128.	Response re Ch. 13 of Draft	One of my staff did this for me as I am away for the next few weeks. I will get him to check it today.	Noted.
129.	General	Our association represents member companies operating a variety of commercial vessels, including traditional (standard) houseboats, charter yachts, hire and drive, off-the-beach craft, take-away boats and boat club and similar operations. Submissions will be made by special interest groups of our members in addition to this formal association submission. Our association supports and concurs with all such submissions, specifically those made by 2 of our specific members. The Association has not sighted and is unable to	Noted. Thank you for your submissions.

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		confirm agreement with any submission made directly by an individual member of the association or other marine industry entity.	
130.	General	In this submission, the term "operator" is considered to mean the commercial entity owning or managing the vessel (noting that the manager may not be the owner). The term "user" is considered to mean the entity making use of the boat that is hired, rented or charter as a class 4 vessel.	Noted.
131.	General	The current edition of NSCV F2 is well understood by members and, notwithstanding a number of technical detail changes that our association is pleased to see in the latest draft of the standard, is a format of document that makes sense for operators: being able to refer to a single chapter for the core of the requirements concerning their operation is efficient and minimises the risk of items being overlooked. The Association recognises and understands the need to move to a standard format for NSCV standards, making use of the topic-based chapter format in the consultation draft. To assist industry in interpreting the requirements relevant to individual operations and individual vessels, we would request that consideration be given to publishing a guide to the standard that draws together references to all relevant clauses for a series of typical operations "“ taking the chapters of the current edition of F2 as a que. This could be presented as an annex or standalone document, to be published alongside the final edition of the standard.	Noted for consideration. The standard will be updated to provide for a specific houseboat chapter.
132.	1.3(2)	Comment about connection between ISO and RCD"¦ Use of dated references to standards is unnecessary given the clarification that the most recent published edition of a particular standard is expected to be used, unless an older edition is referenced by the RCD.	Noted. The full reference will only be detailed in full at 1.3 and then short names throughout the remainder of the body text in the standard.
133.	1.4	Definition of leisure craft and definition of non-survey vessel: The requirement that Class 4 non-survey vessels comply with NSCV Part G should be highlighted by more than a footnote to the definition of leisure craft. This is an important concept that will be easily missed: consideration should be given (perhaps via way of an annex) to document what is a class 4 non-survey vessel within this document, without requiring readers to seek reference to the exemption for certificates of survey. This is a further variance from the current edition of the standard and will be the source of misunderstanding by	Noted. The draft has been updated to provide a note and examples of the kinds of class 4 vessels that may be able to utilise the Exemption 02.

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		an industry sector not versed in referencing multiple sources of regulation and standards.	
134.	1.4	Definition of 'standard houseboat" should read: (2) is less than or equal to 24m in length overall (LOA) (3) is less than or equal to 8.5m in beam (7) note: feedback suggests the concept of subdivision is not clearly understood within the houseboat industry ""use of the term compartment subdivision would assist.	Noted. The draft definition has been updated to reflect less than or equal to, and to reflect the compartment subdivision.
135.	2.1(1)(a)	Should read is less than or equal to 24m in length overall (LOA)	Noted. This has been updated to less than or equal to 24m long. Noting that 'long' is defined as 'measured length' in NSCV Part B.
136.	2.2(1)(d)	As written, this suggests an inflatable vessel is required to comply with all parts of ISO 6185. It should read ¦vessel that complies with the respective/appropriate/relevant? Part of ISO 6185 series with regard to its length and powering"¦" Or simply say "complies with Chapter 12". This clause also suggests that inflatable vessels built to and in conformance with the RCD using means of demonstrating conformance by other than the ISO 6185 series will not be deemed to satisfy the required outcomes of Schedule 1. Use of ISO standards to demonstrate conformance with the RCD is not a mandatory requirement: clause 2.2(1) (b) suggests an inflatable vessel may also satisfy Schedule 1 by demonstrating compliance with the RCD without reference to ISO 6185: confirmation of this is requested.	Noted. The draft has been updated to provide clarity that it is the applicable part of ISO 6185.
137.	3.1 - table 1	Advice from 'member' a division of 'Association' is that the requirement for buoyant appliances and self-igniting lights on such should require only one appliance for houseboats up to and including 24m and that this need not be fitted with a self-igniting light. The requirement as presented is inconsistence with Schedule 8 of the SA Harbors and Navigation Regulations which is the source of technical requirements for houseboat construction and equipment.	Noted. The table has been updated to require only one buoyant appliance.
138.	3.1 Table 1	The requirement that smoke detectors be hardwired into the DC supply should also provide for the alternative solution of a 10-year lithium battery as the power supply. Typo in "˜"™sleeping cabins" delete "s" on "cabins"	Noted. The clause has been updated to reflect the requirements in AS 3786.

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139.	3.1 Table 2	Requirement for 4E vessel to carry an EPIRB should be for remote enclosed waters, as per distress flares. This requirement should be extended to Table 3	Noted. The draft has been updated to reflect this intent.
140.	3.1 Table 4	Requirements associated with enclose sheltered waters are superfluous for vessels operating in operational area C.	Noted. The table has been updated to remove the reference to 'remote enclosed waters' as per your submission.
141.	3.5(3)(a) and (c)	The requirement for persons servicing equipment to be authorised to do so by the manufacturer is unreasonable and unworkable in many circumstances, particularly with regard to equipment that may arrive on an imported vessel, be purchased from overseas or be of a domestic nature, such as found on houseboats.	Noted. The clause has been updated to remove this requirement.
142.	4.5(b) and (c)	It would be appropriate to require that the deck filler for a potable water tank be suitably labelled rather than the tank itself, or in addition to the tank. In way of houseboats it is not reasonable to require that the potable water tank be accessible through a manhole noting that such tanks are pipes located beneath the deck of the vessel between the hulls. They can be emptied but not accessed.	Noted. The clause has been updated to reflect this intent.
143.	4.8(18)(b)	For standard houseboats and other vessels fitted with swim deck platforms, the requirement for reboarding should provide for the swim deck to be a means of reboarding where such decks are less than 300mm above the loaded waterline.	Noted.
144.	8.1(c)	The requirement for the power rating to be in accordance with ISO 8665 is unclear: this standard is a and assessment standard for the engine itself and does not refer to vessel types. Compliance with this standard is a requirement of the engine manufacturer rather than the operator of a class 4 vessel.	Noted. This clause has been updated to provide further clarity.
145.	9.1(1) note	Operators of commercial vessels would be best served if the regulations under which they operate originate from a single source. It is inappropriate that there may be overriding requirements or obligations on a state-by-state basis, such as for electrical installations, but also other topics as relevant. The National Law and supporting NSCV standards should provide a complete one-stop-shop regulatory system.	Noted. It is understood that confusion may result due to the inconsistencies between State, Territory and Commonwealth Legislation., however, the *Marine Safety (Domestic Commercial Vessel) National Law 2012*, specifically works 'in parallel' with the state legislation for matters like Work Health & Safety, Electrical, Gas etc.

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146.	Table 6	For sailing vessels less than 7.5m, the requirement for a lifejacket to be worn is commendable, however the control of this requirement is beyond what can be reasonably expected of the operator. The operator should be required to provide direction to this effect as part of a briefing, however cannot be held responsible for actions of the user after departure. This concept is found throughout the standard, particularly in Schedule 1 Required Outcomes	Noted. It is understood that the owner/operator cannot be responsible for the actions of the hirer/participants once they have taken control of the vessel, similar to seat belt wearing in hire cars. The owner/operator should make all reasonable attempts to ensure that the hirers/participants are aware of the requirements (ie. by way of the briefing).
147.	11.7 Table 7	We are pleased to see acceptance of RCD Module C accepted as a means of demonstrating conformity with the requirements of chapter 3-10. As noted earlier, the measured length categories all should be shown as less than or equal to.	Noted. The lengths have been updated to reflect this intent.
148.	11.8(1)	Noting the acceptance of CE-marked vessels as meeting the requirements of Chapters 3-10, it is unclear what role the accredited marine surveyor will have in surveying the vessel. The provision of CE certification and associated documentation should be sufficient to confirm compliance, based on a desk-top verification of the documentation and a visual sighting of the vessel to confirm it is the vessel recorded in the certification. The documentation will record the unique Hull Identification Number of the vessel and this will also be affixed to the vessel in accordance with ISO 10087 (note, the RCD 2013 refers to this number as a Watercraft Identification Number). The requirement for a surveyor to undertake a physical survey of the vessel is unnecessary and would appear to negate any progress in accepting products compliant with respected international standards and certification. Clarification the requirement of clause 11.8(1) is required.	The role of the accredited surveyor would be to verify on behalf of the National Regulator the correctness and validity of the RCD documentation, which provides evidence of the vessel compliance with the design and construction requirements and subsequently conduct the commissioning survey and provide a recommendation to the National Regulator regarding the vessels completeness (including the survey of items outside the RCD documentation e.g.. equipment /electrical/shaft/etc.).
149.	11.10 table 9	The concept of limiting vessels in various operational areas to specific environmental conditions in way of wind speed and wave height is accepted with regard to the technical detail, however, as per comments on Table 6, it is not possible for the operator to be held responsible for the actions of the user after departure. The requirement should be that the operating conditions form part of the briefing for the user and are noted in documentation provided to the user a part of the briefing.	Noted. The intent of this clause is to impose a condition of the vessels certificate of survey. The owner/operator should make all reasonable attempts to ensure that the hirers/participants are aware of the limits.
150.	12.6	The requirement for the vessel to comply with Chapter 10 section 10.4 is circular: Table 6 requires that the vessel comply with ISO 6185-2 to -4, which is the subject of Chapter 12 section 12.7"¦ Note though that 10.4 requires	Noted. The draft will be updated to provide clarity and allow ISO 6185-1.

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		compliance with ISO 6185-2 to -4 and does not reference part 1, which is provided for in 12.7. This section needs to be reviewed for clarity.	
151.	13.1	Concerns have been raised that the requirement for operational safety to be managed via an SMS as opposed to an SM Plan does not recognise or accommodate that the user is not a formal part of the operators' organisation and that the operator has limited control over the user once the vessel has departed. The working of an SMS is predicated on the persons using and operating the vessel being part of the formal crew of the vessel which is distinct to the role of a user. Consideration of re-instating the concepts of an SMP should be given, as per NSCV F2 consultation draft of February 2015.	Part 3 (s12) of the National Law requires all operations to have a Safety Management System. An SMS is not intended to be used or apply to only owners, masters and crew. It is the responsibly of the owner to ensure the safe operation of the vessel so far as reasonably practicable. This means that the owner (operator) needs to put in place practices and procedures to the best of their ability to mitigate risks. In the case of a Class 4 vessel, this means providing briefings and ensuring the hirer is aware of the law and their obligations (and possibly seeking a signed agreement that outlines all these matters). We recognise that once the vessel is out on hire the owner (operator) is unable to control the actions of the hirer or other persons on board.
152.	13.3(b)(iv)	Including the guide within the total number of persons on board the vessel (noting the maximum number of person for a class 4 vessel is 12) is inappropriate with regard to standard houseboats and other vessels where the guide is on-board only for a short duration and does not remain on board overnight. Table 10 item 4 talks about maximum number of persons as opposed to total number of persons: clarification required as to whether the guide is additional to 12 participants in determining maximum persons. If not, consideration should be given to provide for the guide to be limited to one person and for such in way of houseboats and similar larger vessels for the guide to be additional the total number of persons/maximum number of persons of 12.	Class 4 vessel as limited to a total number of 12 persons on board. This definition reflects that requirement.
153.	Table 10 - item 8	The requirement for an emergency plan for apparently any type or size of class 4 vessel to include requirements for, e.g., fire and assembly stations suggests the requirements have been drawn from SMS documentation for much larger vessels. This is a common theme of this chapter and table. Consideration should be given to advice that the requirements are relevant to the particular type and size of vessel and operation of such.	Noted. The standard has been updated to reflect that the requirements only apply if they apply to the kind of vessel or type of operation.

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154.	Schedule 1	Schedule 1 as a whole is considered superfluous. It is tortuous and in many instances is inappropriate in referencing requirements related to the operation of the vessel: the operator cannot be held responsible for actions of the user once the vessel has departed, other than by providing a briefing and instructional information on safe and proper usage of the vessel and equipment.	The intention of the required outcomes is to provide the overarching requirements of the standard. They are the requirements that the deemed to satisfy solutions mentioned in the Chapters 3 to 12 are intending to meet. They are most commonly referred to when seeking an equivalent solution.
155.	Schedule 1, Div. 2, 2.1	Notwithstanding the comment above, the vessel should be equipped with equipment of a quantity that relates to the maximum number of people permitted on board ""delete words "are on board or". The operator cannot be responsible in any way for persons beyond the maximum permitted on board as defined in the briefing and instructions to the hirer.	Noted. The clause has been updated to reflect this intent.
156.	Schedule 1, Div. 5, 5.2(b)	Constructing a vessel such that it is operable even if structural degradation occurs would appear to be an overly onerous requirement and the intent of the requirement should be clarified.	Noted. This is intended to align to the required outcomes in NSCV Part C3 and has been revised to provide additional clarity.
157.	Schedule 1, Div. 7, 7.1 Note	As with electrical requirements, the user of this standard would be best served if all obligations of the operator were included in this standard as a single source of guidance and compliance with regulation.	Noted. It is understood that confusion may result due to the inconsistencies between State, Territory and Commonwealth Legislation., however, the *Marine Safety (Domestic Commercial Vessel) National Law 2012*, specifically works 'in parallel' the state legislation for matters like Work Health & Safety, Electrical, Gas, Marine pollution etc.
158.	Schedule 1, Div. 9, 9.2	The term "floundering" should probably be "foundering"	Thank you. This has been corrected.
159.	Schedule 1, Div. 9, 9.5(2)	It is unclear which person is required to be able to readily determine whether or not the vessel complies with this division. As it reads, it suggests this is the user, or could include the user, as if such were the master of a ship, or a similarly qualified person able to interpret and assess stability data. This is inappropriate in a standard for class 4 vessels and again suggest this schedule is superfluous.	The required outcomes provide the overarching requirements of the standard. Similar to the general safety duties mentioned in the National Law, the required outcomes apply to numerous parties involved in the design, construction and maintenance of a vessel - including vessel owners (operators), builders, surveyors, designers etc. This required outcome relates to the stability criteria and testing procedures that are chosen for the vessel. It is a requirement of the standard that when the vessel is designed and surveyed, the matters

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			mentioned in this clause are to be considered. This can be accomplished by the deemed to satisfy solutions mentioned in Chapter 10, where it provides that the vessel must meet one of the applicable standards listed & be tested in accordance with that same standard.
160.	Table 6	Would like the standard options to be: C waters and waters where the mean monthly water temperature is < 15Â°C - Level flotation or the alternative basic flotation plus life raft or Dinghy D & E waters where the mean monthly water temperature is = 15Â°C - Basic flotation. We believe the risk profile for vessels operating in D and E waters with the mean water temperature above 15 degrees is dramatically less than offshore waters so a less onerous approach to flotation is valid. The requirement to demonstrate level flotation we have found difficult and tough to proof test and would question the ability of builders other than larger production builders to certify to this high standard. We would prefer not to introduce lifejacket wear as we don't consider this is best suited to introduce into this standard and is better to be left to the states to introduce more broad lifejacket wear requirements based on risk through incident data. We believe that there is an opportunity for alternative arrangements to the buoyancy requirements for vessels of unusual characteristics through equivalence by lifejacket wear and carriage of buoyant appliance through an ad-hoc exemption.	Noted. (1) The water temperature requirement will be replaced by an operational risk analysis so that other factors can also be addressed when considering the flotation options. (2) A range of flotation options including the provision of float off buoyancy has been requested by industry and aligns with the streamlining initiatives.
161.	Schedule 1	The required outcomes listed in schedule one are the defence in depth arrangements extracted from each of the individual NSCV sections, each of these section required outcomes has an accompanying set of deemed to satisfy requirements. As this standard proposal is reduce the deemed to satisfy requirements then there should be a corresponding adjustment to the required outcomes. For example as the fire outcomes have been reduced through the adoption of ISO 9094, it could be argued that the deemed to satisfy through ISO does not address the required outcomes 6.3, 6.4 and 6.6. 6.3 Prevention of exposure to the smoke and heat of fire 6.4 Prevent or delay the spread of fire 6.6 Redundancy of fire safety measures Another example is the new deemed to satisfy guardrail requirement of 600mm and the required outcome of: 3.6 Prevention of people falling overboard The vessel must have arrangements that eliminate or reduce to an acceptable level the risk of a person falling from elevated locations on the vessel, taking into account the competence and physical characteristics of the people on board. If we were	The deemed to satisfy solutions provided in NSCV Part F2 are those that the National Regulator considers an acceptable means of complying with the required outcomes, for a leisure craft. Whilst we acknowledge that these solutions are not equivalent to the current solutions provided for a surveyed vessel under NSCV C4, the test being applied in making this standard is not based on equivalence.

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		to look at any comparable public space standard for barriers to prevent falling from heights, these standards would have a barrier height far greater than the 600mm prescribed in the deemed to satisfy.	
162.	7.1	Add the requirement for dampeners IAW ISO9094:2015 (Whilst earlier versions are able to be utilized).	Noted, but not adopted.
163.	10.4 Table 6 Options 2&3	We believes the water temperature should remain as is in the standard, we have many large inland lakes and rivers where it is not feasible that a person would be supported out of the water, I am sure NSW has similar situations in the large Hydro lakes.	Noted. The water temperature requirement will be replaced by operational risk analysis that should consider in large cold remote enclosed waters and the risks associated with immersion.
164.	10.4 Table 6, Options 2 & 3	It should be Option 2.	A range of flotation options including the provision of float off buoyancy has been requested by industry and aligns with the streamlining initiatives.
165.	Table 2	"Distress signal – orange smoke hand-held" Leave requirements at two (2) flares to align with Part G and how flares are packaged.	Noted.
166.	Table 2	"EPIRB – registered with AMSA" Delete EPIRB requirement - E limits should never include waters >2nm from land.	Noted. The table has been updated.
167.	Table 3	"Distress signal – orange smoke hand-held" Leave requirements at two (2) flares to align with Part G and how flares are packaged.	Noted.
168.	Table 4	"Distress signal – orange smoke hand-held" Leave requirements at two (2) flares to align with Part G and how flares are packaged for sale. Flares are required for all vessels in Qld outside of sheltered waters. Change to reflect consistency.	Noted. The table has been updated to clarify this intent.
169.	Table 4	"EPIRB – registered with AMSA" C limits are 30nm generally. Exclude reference to >2nm from land.	Noted.
170.	8.7	typo - "means", change to "means".	Noted and corrected.
171.	Table 10	PWC and aerial freestyle devices" - it seems implied in the draft that in such operations both the PWC and the jet pack/device are operated by hirers. Suggest that only a very experienced, operator-employed person be allowed to operate the PWC while a hirer is strapped into the jet pack/device. In	Noted and agreed. All references to aerial freestyle devices will be removed from NSCV Part F2.

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		Queensland, hirers in such activities do not operate the PWC. This then raises the question of whether such activities should be included in F2 at all and should rather be treated as a skippered-charter arrangement. Suggest that this would be a safer way to manage such activities. Note that the current AMSA EX35 covers these activities with the PWCs classed as 2C, 2D or 2E and the PWC must be controlled by an "instructor".	
172.	General	May need a transition period with regard to life jackets (draft F2 requires 150N) as many operators have just purchased lifejackets in accordance with current F2 which for E and D vessels calls up recreational lifesaving equipment which for certain vessels allows lower rated life jackets.	Noted. The lifejacket requirements have been changed to type 1 for D & E waters.
173.	H&D competence / Licensing (Ch. 13)	I will get formal comments to you later this week but in the meantime, with regard to hirer licencing, I have attached the two pertinent standards. The relevant sections in the Hire and Drive Standard are 13 and 25. Hire and drive boats are defined in this Standard as being not more than 6m in length (see section 5). In the Bareboat Standard the relevant sections are 18 and 21. Bareboats are defined in this Standard as being above 6m in length (again see section 5). In Queensland we would not want to directly couple recreational licencing requirements to the equivalent hire boat type and operation. However, it is important to note that while the attached Standards had, in cases, reduced licence requirements you can see this was balanced by rigorous risk mitigating requirements in other sections of the Standards.	The standard has been updated to reflect the status quo in current NSCV Part F2 (and previous Qld legislation) that provides that a licence isn't required for vessels with actual speed up to 10 knots in D and E areas. This also provides that Houseboats are also able to continue to operate without the hirer having to hold a licence.
174.	Table 1	a. Anchor Quantity: The wording seems to contradict the anchor quantity. If there is no tidal influence, then the wording seems to suggest no anchor is required. Either increase the need for a 2nd anchor if operating in a tidal flow area or remove the working altogether. b. Fire extinguisher: Add “the quantity and type of fire extinguisher mentioned in AS 1799.1:2009, ISO 9094:2015.” For consistence within the standard. c. Maps/Charts: Use of Beacon to Beacon guides as produced by state marine authorities as available (MSQ produce Beacon to Beacon guides for SEQ).	Noted. (a) The clause has been updated to clarify the intent. (b) ISO 9094 has been removed as an option. We will provide guidance via ‘MYBOAT’ on the application of AS1799. (c) Provided that the Beacon to Beacon guide is a geographical representation of a marine area that identifies prominent shore marks and offshore islands, reefs and shoals - then it will comply with NSCV Part F2.

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		These are an inexpensive alternative to charts and maps and can be downloaded from the internet.	
175.	table 2	Anchor Quantity: The wording seems to contradict the anchor quantity. 1 anchor is the minimum for any type of vessel. If more anchors are required, then the requirement for more than 1 anchor need to be stated. b. Pyrotechnics: 2 x orange smoke flares to match the quantities listed in Part G (consistence) c. Maps/Charts: Use of Beacon to Beacon guides as produced by state marine authorities as available (MSQ produce Beacon to Beacon guides for SEQ) These are an inexpensive alternative to charts and maps and can be downloaded from the internet.	Noted. (a) The clause has been updated to clarify the intent. (b) Noted. The revised NSCV Parts G and F2 have been aligned. (c) Provided that the Beacon to Beacon guide is a geographical representation of a marine area that identifies prominent shore marks and offshore islands, reefs and shoals - then it will comply with NSCV Part F2.
176.	Table 3	a. Anchor Quantity: The wording seems to contradict the anchor quantity. 1 anchor is the minimum for any type of vessel. If more anchors are required, then the requirement for more than 1 anchor need to be stated. b. Compass to be >=75 mm to allow the operator to have an option on size/style to suit the vessel. c. Pyrotechnics: 2 x orange smoke flares to match the quantities listed in Part G (consistence) d. Maps/Charts: Use of Beacon to Beacon guides as produced by state marine authorities as available (MSQ produce Beacon to Beacon guides for SEQ). These are an inexpensive alternative to charts and maps and can be downloaded from the internet.	Noted. (a) The clause has been updated to clarify the intent. (b) Noted. This will be updated to reflect the intent. (c) Noted. The revised NSCV Parts G and F2 have been aligned. (d) Provided that the Beacon to Beacon guide is a geographical representation of a marine area that identifies prominent shore marks and offshore islands, reefs and shoals - then it will comply with NSCV Part F2.
177.	table 4	a. Anchor Quantity: The wording seems to contradict the anchor quantity. 1 anchor is the minimum for any type of vessel. If more anchors are required, then the requirement for more than 1 anchor need to be stated. b. Compass to be >=75 mm to allow the operator to have an option on size/style to suit the vessel. c. Pyrotechnics: 2 x orange smoke flares to match the quantities listed in Part G (consistence) d. Maps/Charts: Use of Beacon to Beacon guides as produced by state	Noted. (a) The clause has been updated to clarify the intent. (b) Noted. This will be updated to reflect the intent. (c) Noted. The revised NSCV Parts G and F2 have been aligned. (d) Provided that the Beacon to Beacon guide is a geographical representation of a marine area that

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		marine authorities as available (MSQ produce Beacon to Beacon guides for SEQ)	identifies prominent shore marks and offshore islands, reefs and shoals - then it will comply with NSCV Part F2.
178.	Table 5	a. Vessel length >=13 m to =< 24m: Number of pumps is confusing as there is a choice given with no explanation as to the need for a 2nd pump. Also the pumping capacities are confusing.	Noted.
179.	8.5	Arrangements for engine monitoring: Add the need for a battery warning light (indicating a broken fan belt or faulty alternator)	Noted. The clause has been updated to clarify the intent and align to NSCV Part C5A.
180.	8.6	Engine exhaust: Add the need for water flow monitoring if a wet exhaust system has been installed. This will prevent the possibility of exhaust system fires.	Noted. The clause has been updated to clarify the intent and align to NSCV Part C5A.
181.	8.8(11)	change the wording “licenced electrician” to “accredited inspector” as a surveyor with ELV accreditation should be able to sign off on this one. As ELV systems are on the vessel, then a surveyor with an ELV accreditation has sufficiently competent to undertake this task.	Noted. The requirement for the inspection to be carried out be a licenced electrician has been removed. The intent being that where wiring appears to be deteriorated in any way, that it is either replace/repaired or tested to ensure the safety of the vessel.
182.	8.11 (2)	Add the need for a label “emergency fuel shutoff”. This will allow any person on the vessel to shutoff the valve under instructions from the vessel’s skipper. With ELV accreditation should be able to sign off on this one. As ELV systems are on the vessel, then a surveyor with an ELV accreditation has sufficiently competent to undertake this task.	Noted.
183.	Table 6 (< 6 m)	In option 2 and 3, add an additional item (d) stating that a risk assessment can also be completed based on the area the vessel is working in. The risk assessment will allow the operator/owner to develop options for safe operations where there is uncertainty with the application of the options.	Noted. Risk analysis has been added as a component of option 3.

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184.	Table 7	Area of operation: The wording “inland waters” should be included in the definition section of the standard. This will remove any confusion as to what constitutes “inland waters”	Noted. Inland waters has been added the clause 1.4 (2). The term is defined in Part B.
185.	Table 10	Element 3 – In operational requirements, add “and the date of the change noted”. Any changes made to SMS manuals needs to be recorded. In column “SMS content requirements” the notation “takeaway vessels” to be explained in the definitions section. This will remove any confusion as to what constitutes “takeaway vessels.	Noted. The clause has been updated to reflect this intent.
186.	Schedule 1, Division 1,Clause 1.1(1)	Change the word “may” to “can” such the wording reads “so that the vessel can be operated”. NSCV Part B, Table 1 defines the meaning of the word “may” to indicate that an option is available.	Noted.
187.	Schedule 1, Division 1,Clause 1.1(2)	Change the word “may” to “can” such the wording reads “so that the vessel can be operated”. NSCV Part B, Table 1 defines the meaning of the word “may” to indicate that an option is available.	Noted.
188.	Table 11	a. item 2 – Bailer size to be >= to 4 L to match the wording of item 8. b. Item 5 – change size to >= 75 mm to allow the owner/operator to choose a compass to suit the style of the vessel.	A Fire bucket may be used as a bailer, however it is not a requirement for the bailer to be at least 4L depending on the type of vessel. The compass requirement has been updated to reflect this intent.
189.	Competency - Chapter 13	I did understand that SA DTEI/DPTI were to maintain representations to all for house boats to be operated without a licence, but with the changes there of late, I’m not sure that this position has been reinforced as part of any submission SA may have made.	The standard has been updated to reflect the status quo in current NSCV Part F2 (and previous Qld legislation), that provides that a licence isn't required for vessels with actual speed up to 10 knots in D and E areas. This also provides that Houseboats are also able to continue to operate with the hirer having to hold a licence.

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		This is a crucial issue for our house boat fleet and I'd be grateful if you would confirm that no licence will be required for such.	
190.	Competency - Chapter 13	In relation to Queensland, recreation licences are required for any boat over 4.5 KW. Again the local MSQ has no idea of whether an exemption exists or would remain in place. Presently we are operating under an understanding that the no licence is required unless the boat can do more than 10 knots.	The standard has been updated to reflect the status quo in current NSCV Part F2 (and previous Qld legislation) that provides that a licence isn't required for vessels with actual speed up to 10 knots in D and E areas. This also provides that Houseboats are also able to continue to operate without the hirer having to hold a licence.