



**MARITIME
INDUSTRY
AUSTRALIA**
L I M I T E D

**MIAL Submission
Independent Review
Coastal Trading Act 2012
1 November 2024**



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1. About MIAL

Maritime Industry Australia Ltd (MIAL) is the voice and advocate for the Australian maritime industry. MIAL is at the centre of industry transformation; coordinating and unifying the industry and providing a cohesive voice for change.

MIAL represents Australian companies which own or operate a diverse range of maritime assets from international and domestic trading ships; floating production storage and offloading units; cruise ships; offshore oil and gas support vessels; domestic towage and salvage tugs; scientific research vessels; dredges; workboats; construction and utility vessels and ferries. MIAL provides a full suite of maritime knowledge and expertise from local settings to global frameworks. This gives us a unique perspective.

We work with all levels of government, local and international stakeholders ensuring that the Australian maritime industry is heard. We provide leadership, advice and assistance to our members spanning topics that include workforce, environment, safety, operations, fiscal and industry structural policy.

MIAL represents companies who own and operate ships under Temporary Licences and General Licenses, as well as in the domestic expedition and international cruise industry. Accordingly, it is our intent to ensure the review appreciates the critical role of both cohorts of licence holders, and the valuable contribution each makes to Australia's economic prosperity.

From a regulatory standpoint, our suggestions for change are directed to the advancement of MIAL's core vision, which is for **a prosperous Australia with strong sovereign maritime capability**.

2. Executive Summary

The *Coastal Trading (Revitalising Australian Shipping) Act 2012* (CTA) was introduced as part of a package of legislation known as the '2012 shipping reform package'. The package was intended to halt the decline of Australian flagged shipping and encourage reinvestment and growth in the sector. In recognition of the need to drive down the cost of Australian shipping, and attract business to Australian ship ownership, the package provided the necessary framework to do just that, including significantly improved beneficial tax arrangements and the establishment of Australia's own international register and an improved cabotage arrangement (the CTA) to increase transparency and support the Australian ship ownership business case.

Unfortunately, the legislative package contained too many restrictions and limitations and was unable to attract business away from flags offering better fiscal incentives – the important point being, the lack of success of the 2012 shipping reform package is not the fault of the CTA, but the uncompetitive nature of Australian fiscal incentives. The good news is, these incentives can be quite easily improved to align with international norms, as is explained within this submission.

While the remit of Phase 1 of this review is to focus on the objects of the Act and how it impacts its design, structure and overall functionality, it is difficult to consider this in isolation, without understanding the intended role of the Act in the context of the 2012 shipping reform package.

With respect to the operation of the core elements of the Act there are opportunities to remove inconsistencies from the objects to clarify its purpose and assist administrative decision making, and for streamlining processes for Temporary Licence (TL) applications, especially with respect to trades where no General Licence (GL) vessel exists.

MIAL is a strong proponent of the opportunities that are presented by the Australian International Shipping Register (AISR) as a driver of a resurgence in Australian sovereign maritime capability. This could be both in the international shipping sector and as a secondary option in Australian coastal shipping, with the inclusion of a tiered approach to coastal trading licenses that includes the AISR.

Careful consideration must be given to regulation of access to the expedition cruise shipping market, balancing the dual challenge of ensuring the domestic industry is supported to be prosperous and enduring in the context of the current policy focus to build sovereign maritime capability, while encouraging ongoing overall growth in a sector with clear economic and strategic benefits to Australia. The large cruise shipping industry services a market sector where there is no direct domestic competition and as such, should be facilitated by certainty of access to the Australian market, and not through a time limited Ministerial exemptions.

The Australian maritime sector is tipped for major growth and increased diversification with the corresponding immense economic benefits. Regulation must be careful not to stymie growth within the confines of Australia's usual high standard of environmental, safety standards. Australian immigration settings currently work well to protect Australian work rights and efforts to increase Australian content in current and future offshore activity, should be heavily weighted towards fiscal and other incentives to attract businesses here.

Long term, direct solutions to Australian maritime workforce shortages sits outside the purview of the CTA. Creating an improved competitive environment for Australian shipping businesses to operate within, including fiscal incentives that align with international norms, is key to attracting shipping business to deploy their assets and expertise to Australia, providing organically the demand drivers that will encourage the investment in Australian maritime skills.

3. High level comments

MIAL appreciates the opportunity to provide input into the review of the *Coastal Trading (Revitalising Australian Shipping) Act 2012* (CTA). In reviewing the CTA, the context within which the legislation was introduced must be understood. The CTA was one element in a package of legislation - the '2012 shipping reform package' – that was championed by then Minister for Infrastructure, Transport, Regional Development and Local Government, Anthony Albanese, which in combination was intended to halt the decline of Australian flagged shipping and encourage reinvestment and growth in the sector.

Along with the CTA, the shipping reform package included the introduction of substantial shipping industry beneficial tax arrangements, including corporate income tax exemption, seafarer tax offset, royalty withholding tax exemption, and accelerated depreciation, in an attempt to align with other attractive Flag states. The reform package also established the AISR which provided for mixed nationality crewing as a means to facilitate the business case for Australian ships to re-enter and compete in international trade.

At the time, the observation was made by many key stakeholders, that while the reform package was welcome and provided the necessary broad framework for industry growth, the legislative package contained too many restrictions and limitations to achieve the level of industry revitalisation intended. The core intention of the package as a whole – to reduce the cost base of Australian shipping allowing Australian shipping businesses to compete, while being supported by a more transparent approach to cabotage – was not met.

While a transparent and navigable cabotage framework is an essential element of a regulatory environment that supports Australian shipping businesses, it should not, in isolation, be relied upon to achieve the required level of Australian sovereign capability that:

1. provide resilience in Australia's supply chain;
2. nurtures and develops critical maritime skills;
3. supports the nation in times of crisis and for national defence.

First among the Strategic Fleet Taskforce Report Recommendations, is that the beneficial tax settings be improved. The current settings fall short of what other nations provide to secure the strategic benefit sovereign maritime capability provides, which means GL ships, notwithstanding the preferential access to domestic cargo the CTA provides for, are at a major commercial disadvantage compared to foreign ships. Until Australia provides at least the equivalent in tax benefits, the objectives of the CTA, in so far as they operate to promote an Australian industry, will not be met.

Our submission includes suggestions relating to the potential conflicts in the objects of the act, streamlining administration and highlights the significant issues related to the treatment of cruise ships, but our high-level position is that the CTA is not fundamentally broken and generally works well as a tool to regulate access to domestic cargo.

While the CTA plays an important role in supporting the business case for GL vessels, it will not in isolation drive an increase in Australian ship ownership. Australian shipping must be afforded the same fiscal incentives as their foreign counterparts in order to be able to compete.

Australian shipping industry tax reform must:

- Address the cost of employing Australian Seafarers, particularly deck and engineer officers by either removing the income tax liability for Australian STCW qualified seafarers, or providing a rebate to employers, and;

- Introduce deemed franking credits in respect of dividends to shareholders to make ship ownership genuinely tax exempt.
- Expand these incentives to vessels operating in the offshore resources sector.

This is the basis upon which foreign vessels operate in Australia, and extending those incentives to Australian businesses will attract investment and encourage growth in Australian sovereign maritime capability.

4. Consultation Questions

MIAL has attempted to follow the general structure of the consultation document, based on our knowledge of the circumstances leading to the implementation of the act and the experience and aspirations of our diverse membership group who span breadth of interaction with the CTA including GL and Temporary Licence (TL) holders and cruise industry participants.

4.1 Objects of the Act

MIAL agrees that the current objects of the act can be interpreted as conflicting and ambiguous and that the Objects of the act should be reweighted to express the overriding intent of supporting the growth in Australian shipping, albeit growth stimulated by other policy measure.

MIAL supports Option 1—A simplified Object with some amendments and the addition of the text in red.

“The object of this Act is to provide a regulatory framework for coastal trading in Australia that:

- *promotes an efficient and viable Australian shipping industry that contributes to the broader Australian economy and strategic national interest; and*
- *facilitates supports the long-term growth of the Australian shipping industry; and*
- *promotes competition in Australia’s coastal trading industry.”*

This simplified object recognises economic strategic value of the Australian shipping industry as an important part of the nation’s industrial base, the critical role of the act in creating a ‘safety net’ or a baseline of maritime capability. The third part of the object is important as it acknowledges the important role of TL vessels in promoting competition and flexible services in Australian coastal shipping.

The CTA’s capacity to provide a positive driver for investment in Australian maritime capability is limited to prioritising the use of existing General Licensed vessels capable of performing the transport work that falls within the scope of the CTA. Whilst conceptually this is a valuable and proportionate approach to ensuring that existing Australian ships operate in designated segments of the freight market, it will not of itself encourage a vessel to obtain a GL instead of a TL.

An optimised regulatory framework for coastal trading cannot in isolation achieve these objects as stated. Rather, it must be acknowledged that the role of the CTA is to support the broad policy objective of an improved shipping policy package that includes tax incentives that allows Australian flagged shipping (GL vessels) to compete.

4.2 Current coastal trading regulatory framework

The CTA is not fundamentally broken, and it is firmly within the national interest to continue to regulate access to domestic trade to support our domestic shipping industry. This is an essential element of a robust regulatory and policy framework that recognises our sovereign maritime capability as a critical element of our industrial base.

However, opportunities exist to streamline administrative processes for GL's and TL's with small changes while maintaining the fundamentals, and not undermining the GL business case.

Administrative efficiencies should always be within the power of those tasked with making decisions; whether these be to grant, or not to grant a TL on the terms sought and how the objectives of the CTA are to be achieved in the making of individual licensing decisions on their merits.

Administrative efficiencies should align with the following principles:

- Provide for the exercise of reasonable discretion by the Minister (or delegate)
- Not undermine the viability of an existing or potential GL trade
- Be consistent with the objects of the Act

As an industry we would expect a reasonable decision maker to have a level of awareness of the market in which they make decisions. Equally, those interested in exploring the opportunity to operate a GL vessel in a new trade may reasonably be expected to signal such intentions to the market, and regulatory body (i.e. Australian Vessel Registry and the Shipping Business Unit).

In circumstances where the delegate is aware that a GL trade may be being pursued, some of the administrative efficiencies suggested below (i.e. expedited and automatic granting of licenses) may not be appropriate. This should not, however, impede the creation of administrative efficiencies where the market has provided no signal of new possible entrants (i.e. no current GL and no active market signal that one is entering trade). The suggestions below are an attempt to navigate this tricky area and provide reasonable parameters for the decision maker to grant a TL or variation, noting that the decision making could benefit from exercising discretionary decision making powers (i.e. waiving a notification period) in line with the objectives of the Act.

4.3 Temporary Licenses

Possible changes to TL application and variation process that may help to streamline and reduce the administrative burden for TL applicants:

- Remove the '5 or more' voyage requirement (s.28(2)(a) and s.51(2)(a)). Replace 5 with 1.
- If there are no GL vessels operating in the trade in question (i.e. currently there are no GL tankers), TL can be automatically issued.
- If there is a GL operator in a particular trade or sector, (i.e. dry bulk), they could nominate ports/trades/cargo types they are/are not interested in. Further to this, they can nominate whether they exclude themselves from original voyage applications AND variations, or just original applications. If the GL circumstances change, they can withdraw the exclusion from a certain date.
- If the GL holder has nominated an exclusion (i.e. the Bass Strait operators possibly have no interest in any container movements between mainland ports), all other applications for that cargo type will be automatic/instantaneous. This gets rid of the 2 day wait for Notice in Response, and the need for the Minister to 'decide' an application, therefore making the approval instantaneous.
- If a GL withdraws their exclusion, this change in circumstances must be immediately communicated (i.e. be listed on DITRDCA website).
- At that time, the 'system' returns to the current provisions of the Act – that being:
 - GL holder cannot contest any existing, approved TL voyages
 - GL holder can contest any new applications
 - GL holder can contest any variations to approved voyage, after 2 weeks of advising DITRDCA of the withdrawal of their exclusion (i.e. they have provided notice to the market that the market has changed. In order not to disadvantage any TL holder that was working on the basis that the variation would be automatically processed, a grace period of 2 weeks is provided to them).

- Additional requirement is to abolish the notification period of 2 days. If a notification period is needed for other reasons (AMSA, customs etc.), notification should only be required prior to loading.
- Outcome could be that applications can be applied for, approved and notified hours before the vessel commences loading.

4.3.1 Preferential access for AISR vessels

Currently, Australian International Shipping Register (AISR) vessels are treated the same as foreign flagged vessels with respect to access to domestic trade. The government should consider introducing tiered preferential access to TL's for AISR vessels. It is widely acknowledged that if certain regulatory and policy conditions are improved, the AISR provides an important opportunity for growth of Australian shipping (see 4.4.1 below for further commentary about the AISR)

4.4 Improving the business case for Australian shipping

As noted above, the CTA was introduced in 2012 as one element of a package of reforms intended to attract shipowners to the Australian flag (AGSR/AISR). At the time it was identified, and it remains a fact today, that due to high labour costs compared with foreign labour on international ships, and uncompetitive corporate tax arrangements under the Australian register, the use of Australian shipping comes at a significant cost premium to shippers.

Instead of compelling frequent TL users to transition to GL, or use some other yet to be defined license, Australian shipping industry tax settings must be improved to incentivise shipowners to base their operations from Australia, in combination with maintaining a strong cabotage regime to support the GL business case.

Australian shipping industry tax reform must:

- Address the cost of employing Australian Seafarers, particularly deck and engineer officers by either removing the income tax liability for Australian STCW qualified seafarers, or providing a rebate to employers, and;
- Introduce deemed franking credits in respect of dividends to shareholders to make ship ownership genuinely tax exempt.
- Expand these incentives to vessels operating in the offshore resources sector.

This is the basis upon which foreign vessels operate in Australia, and extending those incentives to Australian businesses will attract investment and encourage growth in Australian sovereign maritime capability.

4.4.1 The Australian International Shipping Register (AISR)

In parallel to this submission, MIAL has also made submissions to the review of the *Shipping Registration Act 1981* which has included a significant focus on beneficial changes to the Australian register that could encourage investment in the Australian General Register (AGR) and the Australian International Register (AISR). We would ask that the reviewers consider the points made in those submissions when considering the CTA. It is MIAL's position that a coastal trading framework should provide a proportionate benefit to those who do invest in the Australian industry.

Currently the benefit for the AGS is reasonably clear; the eligibility for a GL which provides the ability to challenge the right of a foreign ship to carry domestic freight and passengers under a TL. The benefit for registration on the AISR and the associated investment, is far less clear – AISR vessels are ineligible for a GL. In the coastal trading context, the AISR provides almost no more benefit than a foreign vessel despite its undoubted strategic benefit to the nation. While in 2012 there may have been an imperative to ensure there was no perceived undermining of the AGR through the creation of the AISR this fear has not been realized, and the opportunity to grow an Australian presence has not been captured.

This is not necessarily the fault of the CTA providing sufficient recognition and benefit for AISR vessels. However, it certainly has not encouraged the use of this register, and the result has been the continuing decline of general licensed AGR vessels.

The existing nuance in the CTA, that the Minister may have regard to circumstances where the owner of the vessel registered on the AISR also owns the cargo to be carried under TL¹, is so specific as to be almost worthless. This limited benefit combined with a failure to achieve internationally competitive tax settings for vessel operators has meant there is no driver toward registration on the AISR. This is because an AISR vessel operates from a slightly higher cost base than an international vessel does without the tax benefits which the international vessel enjoys; with no clear identifiable advantage in the coastal trading hierarchy to encourage vessel owners to invest in AISR ships.

The eligibility criteria, that a vessel predominately be engaged in international trading also limits the trades in which an AISR vessel may be commercially viable. Both these trades and domestic trades are in the majority not being undertaken by vessels on the AGSR. These trades are currently being undertaken by foreign vessels. That objectively a foreign vessel has more ability to identify and perform a shipping service carrying domestic cargo than a vessel sailing under the Australian flag does (the AISR), suggests a misalignment of any hierarchy that the coastal trading regime may seek to promote.

MIAL therefore recommends that further thought be given to the status of an AISR vessel within the coastal trading framework and whether a category of license be created so as to allow potential investors to see registration of the AISR as an opportunity to become part of the Australian shipping community or extend their operations within it.

4.5 Cruise shipping

The Australian cruise shipping industry is an important economic contributor to our broader tourism industry, directly and indirectly drives investment in Australia's regions and remote communities and plays a critical role in building connections and investment in the Pacific region, aligned with Australian strategic interests.

The Australian cruise industry is comprised of large foreign flagged vessels and a mix of smaller foreign flagged and Australian flagged ships participating in the expedition cruise sector.

While the treatment of the expedition cruise sector is complex, the situation regarding large cruise shipping servicing a market sector where no domestic operator exists, is much clearer. The significant economic benefit to be derived from this sector should be facilitated by certainty of access to the Australian market.

4.5.1 Regulation of access to the Australian market

This review presents an opportunity to examine two critical issues relating to how the cruise industry accesses, operates within, and contributes to the Australian tourism market in the context of Australia's economic and strategic national interest:

1. The competition between participants, comprised of a mix of foreign and Australian flagged ships operating in the expedition cruise sector along a spectrum of vessel sizes, including the strategically important locally flagged and crewed vessels.

¹ see section 34(2) of the *Coastal Trading (Revitalising Australian Shipping) Act 2012*

2. Uncertainty related to the time limited Section 11 cruise vessel exemption and the impact on the large cruise ship industry, of which there is no local equivalent.

4.5.2 Competition

There is a spectrum of vessel sizes and classes that operate within Australia's expedition cruise sector and the types of operators participating in the sector has changed since the section 11 cruise vessel exemption was drafted.

The domestic industry is comprised of small ships, able to access more remote areas around the Australian coastline. Traditionally, foreign lines accessing this market have fallen outside the section 11 exemption and access to the domestic market has, in an imperfect way (see 4.5.3 below), been regulated somewhat through the CTA. This means that while foreign ships have significantly lower labour costs (on a per person basis), competition with the local providers has been tempered by the requirement for TL application, and the subsequent ability of the local operator to contest in accordance with the CTA framework.

In recent years two separate but related changes in the expedition sector have occurred.

- TL decisions have gone against domestic operators; and
- There has been an increase in the number of larger international vessels participating in the expedition sector that fall within the s. 11 cruise ship exemption.

These developments have resulted in a reported reduction in confidence for the domestic operator and potentially loss of market share, however the situation regarding the impact on market share is more difficult to quantify without in-depth analysis involving data from all parties.

Increased fleet capacity in the region may indicate that passengers are choosing a foreign flagged offering over a locally flagged offering; although foreign operators report that much of the foreign flagged capacity is filled with international tourists, thus growing the overall market base.

Detailed independent analysis of the facts is required before any reliable conclusions can be drawn. Such analysis will be critical in guiding decisions to meet the dual challenge of ensuring the domestic industry is supported to be prosperous and enduring, while encouraging ongoing overall growth in a sector with clear economic and strategic benefits to Australia.

4.5.3 CTA treatment of non-exempt cruise ships

There are a range of complexities relating to the treatment of cruise ships under the CTA that fall outside the Section 11 exemptions. Tourism packages may not be comparable like for like and the fact that the passenger participates in the decision about which vessel to use as part of a tourism package complicates decisions that the delegate may be faced with. The review should consider whether an alternative approach could be taken to regulation of access to the market.

4.5.4 Consideration of a separate regime for cruise shipping

Successive governments have recognised the complexity of the problem posed and it is presumably for this reason the power to exempt from the application of the CTA was deliberately inserted. The cruise vessel exemption, albeit for different timeframes, has operated continuously since first granted.

This review should explore a possible separate regime for the treatment of the cruise ship industry in the overall benefit to Australia. Consideration of a possible separate regime should include the following principles and concepts:

- The need to ensure the sustainability of Australia’s domestic expedition cruise ship industry due to its strategic value to the nation in terms of the industry’s contribution to Australia’s sovereign maritime capability.
- The significant lead times required for marketing and planning timeframes.
- The need to preserve the reputation of Australia’s marine tourism sector and encourage growth in the industry.
- There is an intrinsic value both to the Australian economy and to remote Australian communities of a vibrant and diverse expedition cruise industry that includes an international and sustainable domestic component.
- There is a significant economic benefit to be derived from large cruise shipping servicing a market sector where there is no direct domestic competition. This industry should be facilitated by certainty of access to the Australian market, and not through a time limited Ministerial exemptions.

4.5.5 Supporting Australia’s domestic expedition cruise industry

Australia’s home-grown expedition cruise industry needs to be able to compete with foreign flagged expedition ships operating on international norms in terms of seafarer employment and other fiscal structures (see 4.4 Improving the business case for Australian shipping). It is essential that domestic expedition cruise participants are supported to be prosperous and enduring. As a component of Australia’s remaining sovereign maritime industry, these domestic operators are important employers of Australian seafarers and provide training and skills development opportunities for Australian mariners in the context of a national maritime skills crisis.

Again, this review provides an opportunity to examine practical ways the Australian government can support the strategically important domestic operators while facilitating access by foreign cruise shipping, and the economic benefits a diverse and vibrant industry brings. Support for domestic expedition cruise shipping, that lies within the remit of the federal government, could include:

- Addressing the cost of employing Australian Seafarers, particularly deck and engineer officers by either removing the income tax liability for Australian STCW qualified seafarers, or providing a rebate to employers, and;
- Introduce deemed franking credits in respect of dividends to shareholders to make ship ownership genuinely tax exempt.
- Training grants for all onboarding and ongoing crew to support skilling initiatives and backfilling roles during training blocks.
- Subsidise for crew travel and associated operational overheads.
- An increased fuel subsidy for all operations in Australian waters.
- Marketing grants to assist the industry to diversify our domestic market and reach new export markets.

There are other potential state/NT based incentive and support mechanisms relating to pilotage exemptions and port fees that could also be considered in consultation with those relevant jurisdictions.

4.6 Future of Australian shipping

While very few of the vessels operating in the Australia’s offshore industry are Australian flagged, they are operated by crew with specific Australian work rights due to the operation of Australia’s migration zone in relation to offshore resource activity that occurs in waters within the exclusive economic zone and above the continental shelf. As a result, the offshore industry is a major employer of Australian seafaring skills, and the cyclical nature of the sector often drives the countries maritime labour market.

The definition of coastal trading is sufficiently broad, and MIAL would not support expansion of Australia's cabotage regime to include offshore activity which can include a very short-term work phases combined with a consistent longer-term presence.

The key to maximising Australian content in the forecast growth and diversification of Australian maritime activity, ensuring benefits flow to Australian business and skills development, lies in the creation of an attractive business environment and the expansion of *improved* beneficial tax arrangements to the offshore sector, as outlined above.

A further key to ensuring the future of a domestic industry capable of servicing our national need is a framework that is stable and capable, due to its broad cross section of support, of largely withstanding changes in Government. Providing support for an Australian industry must be viewed as a long-term commitment for those operators willing to invest.

4.7 Strategic Fleet Taskforce Recommendations

Strategic fleet vessels will have a distinct advantage in that they will be eligible for a GL, with the associated preferential access to coastal trade, and as they will be in receipt of a government subsidy, they will be able to compete on a level playing field with foreign ships and provide similar, if not improved freight rates.

Notwithstanding the fact that consideration of how subsidized (strategic fleet) vessels might one day compete with other GL vessels may need to occur in the future, MIAL sees no reason why strategic fleet vessels should be treated differently to other GL vessels under the CTA.

4.8 Addressing workforce supply challenges

Direct solutions to Australian maritime workforce shortages sit outside the purview of the CTA. Creating an improved competitive environment for Australian shipping businesses to operate is key to attracting shipping business to deploy their assets and expertise to Australia, providing organically demand drivers that will encourage the investment in Australian maritime skills. The role of the CTA is to provide security of access to Australian coastal cargo to support the business case for Australian shipping, which indirectly ensures the Australian businesses and assets exist to train.

The following initiatives will have a direct positive impact on seafarer training:

- Make shipping company income tax genuinely exempt and extend to Australia's offshore sector
- Remove or rebate income tax from all Australian seafarers working on ships that are capable of international operation (STCW qualified seafarers working at sea).
- Share the cost of seafarer training across the end user groups through a broad based industry levy
- Promoting the use of AISR vessels through the licensing hierarchy, creating more platforms for training to place and an increased imperative to secure a domestic supply of strategic maritime skills.