

1. It is unfair that we, as a domestic company, have to compete with Class, whose surveyors who are not required to be individually accredited as we are and in many cases are not even based in Australia. We would support either requiring them to be accredited, or for companies such as ourselves with the capacity to do so we should be allowed to recruit, train and control surveyors in the same way they do.
2. The breadth of the proposal to roll back grandfathering is likely to produce some significant and unnecessary complication and unexpected consequences if put forward as phrased. There are already significant mental health consequences to the rumours swirling around the waterfront and more work on this needs to happen. We agree that it needs to happen but there is a smart way to do so and industry involvement is we would suggest necessary to avoid this becoming a stuff up.
3. There should be a fundamental look at the way AMSA is doing its business- the amount of otiose paperwork they are generating and the impost this places on operators- examples include COO in-toto- as well as documentation for surveys. Qualified staff are misemployed pushing paper around and our suspicion is that if they were freed to work directly on safety related initiatives their morale problem would be largely overcome. Once this is done, the true and defensible cost of the system will emerge and it will be a much easier 'sell' to stakeholders when the cost recovery discussion is held- people will see the direct value of the \$\$ they are being asked to contribute.