



RINA

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**SUBMISSION IN RESPONSE TO DRAFT INTERIM SAFETY REPORT – PHASE 1
OF
INDEPENDENT REVIEW OF DOMESTIC COMMERCIAL VESSEL SAFETY
LEGISLATION AND COSTS AND CHARGING**

The Australian Division of The Royal Institution of Naval Architects (RINA) has examined the draft interim safety report and found it to be a well-considered and reasoned assessment of the submissions made to the Panel, and in particular broadly in accordance with RINA's submission to this phase.

Our main concern in relation to the recommendations is to ensure that the implementation of the recommendations do not either in the short- or long-term result in degradation of AMSA as a widely-respected safety regulator. A number of RINA members have noted that Government policies in place since AMSA was established have reduced Australian blue-ocean shipping to almost zero and that the long-term application of the efficiency dividend to AMSA has resulted in an alarming degradation of its maritime expertise both in terms of staff numbers and the filling of technical positions at reduced salaries by personnel having inadequate commercial maritime qualifications and experience. Our concern extends to the potential for the risk-based approach of the Panel's recommendations being undermined over time into a box-ticking exercise by allocation of inadequate staffing in terms of numbers, qualifications and experience.

We will therefore give careful consideration to making a submission along these lines to Phase 2 of the Review.

**Jim Black FRINA CEng
President, Australian Division**