Hello AMSA and team,

My comments reflect what I believe to be an improvement to the entire system with your goals reflected.

Continue with the requirements for:

Float free EPIRBs

RCD installation and testing, and where possible on complex systems meggar testing. Continue to improve the My Boat portal so as to be accurate and reliable to the vessel owner and surveyor attending, particularly with equipment lists.

Prior to the NSCV system, some states had this equipment list in the survey record book , on each vessel.

For the lower cost grandfathered vessels, install a simplified stability test, 1 off, and record perhaps only 2-3 pages for around \$2000. The conventional full stability book at \$12500+ and 29 pages is unaffordable and mostly misunderstood nor used by the crews applicable. If this simplified stability test could show a sketch of the vessel with watertight bulkheads and down flooding points and be available on the vessel and in the MARS system for easy access by the surveyors & crew, it would create a benchmark starting point. Often there is no such data nor photos of the vessel from previous years and a surveyor is left guessing and or assuming some critical areas that may or may not be grandfathered. Previous reports and comments should also be available for the following surveyors, via MARS.

2 other points I have found improved upon in the past decade, but far from perfect; are the collection of expired flares, and the availability of oily waste disposal sites. They need no explanation, just improvement.

Kindest regards from,



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