

To whom it may concern,

Comments regarding the independent review of domestic commercial vessel safety legislation and costs and charging arrangements (AMSA), including the negative feedback and inefficiencies identified from the perspective of a medium sized (four surveyors and two management staff) Marine Survey and Engineering private company are as follows:

- Data issues are prominent and one the private sector deals with frequently. Missing / lost vessel information from the transfer between the state and AMSA is an ongoing challenge that is faced. Constant Freedom of Information requests, multiple payments made to IP holders, most of which AMSA do not have record of. Incorrect data held by AMSA. This has been addressed to AMSA with no outcome. (Ref: 14/02/2023 to [dcv.records@amsa.gov.au](mailto:dcv.records@amsa.gov.au) / [AMSAconnect@amsa.gov.au](mailto:AMSAconnect@amsa.gov.au) / [dcvsurvey@amsa.gov.au](mailto:dcvsurvey@amsa.gov.au))
- Increased fees and levies are not desired, nor fare. The whole point of AMSA is to provide safety (not to be a money-making exercise) to the Marine sector and should be able to run at some loss as it is a government department. It has been noted that private surveyors are working on finer and finer margins, if the levies are to increase then I fear corners will be cut.
- In the current market small businesses are already dealing with increased regulatory and compliance fees across the board, not to mention the uncertainty with fuel and other costs skyrocketing. Maintaining vessel survey to AMSA regulations is a costly exercise already.
- Cost saving and efficiencies can be made within the AMSA framework.
  - AMSA Marine surveyors double check private AMSA accredited surveyor reports (renewal surveys etc) which serves as a cost to AMSA. Why are AMSA surveyors checking all submissions of which are uploaded by an AMSA accredited surveyor? This defeats the whole point of the privatised system and is a huge and costly double up of effort.
  - MSI conducting inspections of which an AMSA accredited surveyor has completed recent surveys on? Industry and surveyors are frustrated with this as the impression is not a percentage audit of the fleet, but a full-on risk based program and double up of effort normally straight after the private accredited surveyors reports have been submitted.
  - AMSA should take at face value private accredited marine surveyor recommendations to minimise overheads. Private marine surveyors conduct, upload and data enter their own reports to AMSA systems without AMSA interference. It seems this data is not checked, and we are doing data entry for AMSA (at no cost to the government). We aren't charging AMSA for our time...
- AMSA Accredited marine surveyors should have approval to make their own judgment calls regarding vessel conditions and recommendations. AMSA would save costs in this area if they recognised their AMSA accredited surveyors' decisions. Having AMSA surveyors check all submissions is a double up on work and causes delays to operators. Accredited marine surveyors should also be able to issue their own certificates of survey to operators.

Kind regards.