

Question 1: What is the nature of the costs that you (or your DCV sector) incur? This can include for example charges recovered by AMSA for fee-based activity, any relevant jurisdiction-specific fees and charges, accredited marine surveyor costs, etc and can include one-off and regular costs.

- It would be useful if you could provide an indicative estimate of the current annual costs of a DCV operator within your subsector in your jurisdiction.
- It would also be useful if you could provide an indicative estimate of the percentage increase or decrease in these costs since 2017–2018.
- The Panel is also interested in understanding the annual cost for the same/similar services incurred by you (or your DCV sector) under the pre-National regulator state-based system.

### **Vessel registration**

Question 2: What are the considerations that you believe should be taken into account in determining whether full or partial recovery of the costs of the National System is appropriate, and to determine the level of cost recovery? Please provide examples to support/illustrate your response.

**Operators should not be forced to pay for efficiencies or lack there of which are beyond their control. Years on the national system still represents a moving goal post.**

Question 3: What funding approach or mix of approaches do you believe would best achieve secure and stable resourcing of the National System.

**Fixed registration fee with increase linked to cpi.**

Question 4: What are the aspects of a vessel or its operation that could form a suitable basis for levy-based cost recovery?

**For passenger vessels fees should be calculated using maximum passenger capacity as a multiplier**

Question 5: Having regard to Finding 1 and Recommendation 1 of the draft Report, how could a potential levy be structured to better reflect the level of regulatory effort and resources directed towards sectors of the DCV industry differentiated on the basis of risk? Are there sectors, or part of sectors, that should be exempted from any future levy; if so why should they be exempt?

**Tourism vessels represent a significant export industry which has been decimated over recent years**

**Exemption should be considered here. If vessels are profitable there is more funds to be spent on upgrades and maintenance .**

Question 6: What are the industry subsectors most likely to be affected by the proposed winding back of grandfathering arrangements?

**Marine tourism will be highly effected. usl/nsv primarily addresses industrial style craft and fails to adequately provide for tourism vessels such as sail powered yachts.**

**As such much of compliance with code has been based on deemed to satisfy solutions.**

**By its nature this is highly subjective. When grandfathering winds back these vessels will then be assessed by a surveyors opinion. Which once again will contain subjective opinion. Its seems illogical to repeat this process .**

Question 7: What is the nature of the impacts that these subsectors are likely to experience? For example, survey costs, costs of upgrades to vessels, costs of upgrading crew competencies, difficulties finding crew with requisite competencies, etc.

**-A possible reduction in vessel safety. Operators will be less likely to invest in vessel assets which are devalued by the uncertainty and business risk surrounding this process.**

**-Loss of income for crew stood down due to this process.**

**-Costs and complications for modifications to vessel.**

**-Severe Lack of skilled tradespeople in area to complete modifications.**

**-Severe shortage of government accredited surveyors supplement this process**

Question 8: What form/s of targeted support do you consider would be effective in assisting the DCV fleet impacted by the phased withdrawal of grandfathering arrangements?

**100% Reimbursement for loss of income**

**100% Reimbursement for slipping fees/marina fees during downtime.**

**100% reimbursement for surveyor fee.**

Question 9: What are the relevant economic impacts and/or costs or resourcing implications (positive or negative) of any of the recommendations in the draft Report that the Panel should consider?

**High costs and downtime .**

**Lack of investment in industry due to uncertainty .**

**Loss of export income for overall economy**