

# NATIONAL MARINE SAFETY COMMITTEE INC.

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ABN 39 520 369 380

21 April 2006

Ms Sue Holmes  
Standards and Accreditation Study  
Productivity Commission  
PO Box 80  
BELCONNEN ACT 2616

Fax No: 6240 3300

Dear Sue

**RE: PRODUCTIVITY COMMISSION STUDY ON THE RELATIONSHIP BETWEEN  
THE AUSTRALIAN GOVERNMENT AND STANDARDS AUSTRALIA AND NATA**

The National Marine Safety Committee (NMSC) welcomes the opportunity to submit some views on this study as announced earlier this year.

By way of background, I should advise you that the NMSC is an Intergovernmental Committee established in 1997 by COAG to achieve uniform marine safety legislation and practices throughout Australia. The committee is comprised of senior executives of marine safety agencies throughout Australia, with the New Zealand Maritime Safety Agency having observer status. The committee is supported by a small secretariat based in Sydney.

The NMSC consults widely with industry and invites industry members to sit on a range of reference, advisory and professional panels. One of the major outcomes of the work of the NMSC is the National Standard for Commercial Vessels (NSCV) that is referenced in State and Territory regulations. The NMSC also produces other standards and guidance documents related to marine safety and, in the context of your study could be considered as a Standards Development Organisation (SDO).

In developing standards and guidelines, the NMSC references a large number of Australian standards developed by Standards Australia and it is in that context that I will be commenting on in this submission. The NMSC does not directly relate to the laboratory accreditation services provided by NATA except in so far as we accredit certain products which conform with our standards. In relation to the issues of interface between Standards Australia and the NMSC, I offer the following comments:

- The NMSC has not sought to be accredited by Standards Australia as a SDO to develop Australian Standards as to date we do not see any additional advantage that this would bring. Neither have we been encouraged to do so by the Department of Industry, Tourism and Resources.

- The NMSC has, in recent years, experienced some difficulty in encouraging Standards Australia to revise a number of its standards that have got out of date. This is especially true for the revision of *AS 4132-1993: Boat and ship design and construction - Design loading* that is currently referenced in the Uniform Shipping Code (the predecessor of the NSCV) that is now out of date. Anecdotally we have been advised that a revision has not been undertaken as “AS 4132 is a poor seller. We would hope that the new arrangement between Standard Australia and SAI Global would negate this commercial pressure.
- In a similar way, the NMSC has not been encouraged by a reluctance of Standards Australia to instigate a revision of *AS 1799.1-1992: Small Pleasure Boats Code - General requirements for power boats*, especially as it could incorporate the provisions of international standards *ISO 12215: Small craft - Hull construction and scantlings*. Anecdotally we have been advised that the reason for this is that “AS 1799 is not generally used in the Australian small boat industry” – we do not believe this is true and we have recently specified compliance with AS 1799 as one of the references for designation criteria in the NMSC standards for a “builder’s plate” that has to be affixed to most recreational boats.
- That said, the NMSC and its marine safety agency members are involved in Standards Australia committees developing other Australia Standards for the marine industry and seek to continue this relationship.

I believe Standards Australia could be more proactive in engaging with regulatory agencies and with organisations, such as the NMSC, that represent regulatory agencies.

Apart from the above comments about the efficiency and effectiveness of Standards Australia in delivering timely relevant standards, the NMSC does not have any comment on the other issues covered by the PC Study. At this stage, we do not see any necessity for a meeting with the Commission but we would be prepared to be involved in further discussion after the Draft Report is issued.

Please do not hesitate in contacting me if you require any further information.

Yours sincerely

Maurene Horder  
Chief Executive