



## **Submission to the Coastal Shipping Policy and Regulation Enquiry**

I wish to state at the outset that the views expressed within this submission represent my opinions as the Manager responsible for maritime training associated with coastal shipping, and not necessarily those of Challenger TAFE as an organisation. What follows is an introduction to myself and my organisation, followed by submissions addressing terms of reference 1, 2 and 3 of the enquiry. I will leave it to others to address the remaining terms of reference as I have no formulated position against these criteria. However, I do believe it is important when considering one aspect of the maritime industry to take into account the impact that change in one area has in other sectors.

### **Robin Gray and the WA Maritime Training Centre Fremantle**

I have been a maritime trainer at the WA Maritime Training Centre Fremantle for 24 years after spending 11 years as a seagoing officer in the UK Merchant Navy trading around the world, including frequent visits to Australian ports. I left seagoing employment with a Master (Unlimited) Certificate of Competency and emigrated to Australia where I spent 8 months working as a cargo surveyor before commencing my teaching career in Fremantle.

The WA Maritime Training Centre Fremantle (WAMTC) as a business unit within the TAFE system has provided for the training needs of WA Mariners for more than 30 years, and in that time has expanded its capability from training for local fishing industries to the provision of a complete range of programs for seagoing deck and engineering personnel across all sectors of industry including the offshore oil and gas support sector in particular. Our students come from all areas of Australia as well as internationally.

During my years at WAMTC I have been a lecturer, part time and fulltime manager of programs, as well as taking a significant lead role in the development and maintenance of curriculum both independently and within the Australian Quality Training Framework. I have, in conjunction with industry developed programs from short intensive courses to post graduate qualifications, and have participated on the steering committee reviewing the Maritime Training Package (TDM07), representing Australian training providers.

With respect to the terms of reference of the enquiry I submit the following comments:

### **Outline the nature and characteristics of the Australian shipping industry and the international coasting trades**

The Australian maritime industry consists of a wide range of activities including:

- Import and export of freight in dry bulk, packaged and liquid form
- Transport of goods between ports and States either for relocation or supply purposes

- Support (in many forms) for the offshore oil and gas exploration and production sectors
- Fishing operations
- Ferry operations
- Marine tourism operations locally, along the Australian coast and the international passenger market
- Naval and paramilitary operations
- Harbour operations in support of the above

The current review seeks to investigate the first two points listed above, but I contend it is dangerous to look at one sector of the maritime industry in isolation from the remainder because the industry as a whole is a fine balance between the various sectors. Perhaps the most significant factor in the maritime industry are its people and this is a finite resource. So any change in the balance between sectors creates an increase in demand in one area and a corresponding shortage in another.

### **Review the policy and regulatory arrangements in place for the coastal shipping sector**

Maritime matters in Australia are regulated by both the Federal Government and the States. The Australian Maritime Safety Authority (AMSA) is responsible for, amongst other things, ensuring that Australia complies with the requirements of the various conventions of the International Maritime Organisation (IMO). The States, generally through their Marine Authorities, are responsible for matters relating to the operation of ports and harbours, as well as maritime operations that lie outside of the international conventions. They each operate under a variety of Acts of State Parliaments and are coordinated via the National Maritime Safety Committee (NMSC). Regulation is intended to be through State implementation of the National Standards for Commercial Vessels (NSCV) but that creates a problem as each State needs to get the various aspects of NSCV through their processes which inevitably leads to delay and thus, at least legally a range of different requirements.

From the perspective of a trainer this means we are required to train to standards of not only the nationally endorsed Maritime Training Package, but also the vagaries of different State and Federal systems. I contend that this is illogical and inefficient. Although politically difficult to envisage it would appear to be appropriate to have Federal control of regulation to ensure efficiency across all jurisdictions.

I do not intend to comment on issues relating to the transport of goods between ports in Australia

### **Assess strategies for developing an adequate skilled maritime workforce in order to facilitate growth of the Australian coastal shipping sector**

When considering the potential strategies with respect to the development of an adequate skilled maritime workforce it is necessary to consider how that workforce can be developed. The maritime workforce (and by this I refer to seagoing in particular, although I acknowledge there are shore-based elements as well that need to be addressed) operates in a highly regulated environment. It consists of a hierarchical structure of personnel who are

fundamentally officers (those holding maritime certificates of competency or licenses) and ratings (who have qualifications and experience). The nature of the licensing system for both Deck and Engineering Officers means that to achieve qualifications at the highest level (Master (Unlimited) and Marine Engineer Class 1 takes approximately 75 months plus periods of leave. During this time personnel gain qualifications and experience as they move through the various training and operational requirements of national and international legislation. This experience is essential for the individual to learn not only the requirements for their marine qualification, but also the various aspects of managing a commercial seagoing operation.

Whilst ratings training is considerably shorter to achieve the necessary qualification, it would be inappropriate to man a vessel with a crew of newly qualified personnel. Generally a crew would need to consist of a range of experience to maintain the balance between experience and the need to develop personnel.

Ships are manned therefore by crews consisting of personnel with a range of qualifications and experience. It is not therefore feasible to simply train up a new ship's crew, and current experience is that there are serious shortages of qualified personnel seeking employment. So the aim of developing coastal shipping would need to be accompanied by a long term strategy associated with training, with the only other alternative being importation of personnel.

There are four aspects of a training system which all fit together as links in the training chain. These are:

- Trainees
- Trainers (both on shore in training establishments and at sea)
- Training infrastructure (again ashore and at sea, plus adequate training resources)
- A training program

Each requires addressing so that the chain remains whole and able to perform the job. Allow me to expand:

*Trainees* For many years there has been an adequate demand from suitable personnel to undertake seagoing careers. Various maritime employers have in recent times reported that they receive sufficient enquiries to fill available training berths, and indeed numbers of employed students have been slowly rising in WA in the past two years. However, from a training perspective a significant proportion (say 20%) of students who undertake initial training are probably going to drop out of training as they either do not have the aptitude or educational background for a seagoing career. Experience as a trainer has shown that there are about enough potential students in our current marketplace to fill existing demand in officer training categories. Ratings trainee places are relatively easy to fill, although often by retraining students from other industry sectors. However, any significant expansion of officer training demand is likely to prove more difficult to satisfy with suitable applicants.

One solution to this is to market a maritime career in areas of Australia not associated with major shipping sectors. As the review is considering coastal shipping, ports away from the major capitals of Perth, Melbourne and Sydney should be considered for recruitment. Another

solution with respect to retention is to create a perceived benefit to a seagoing career in competition with other industries. This could equate to alignment of training to higher education outcomes (This is possible at the Australian Maritime College at present, but not within the TAFE sector).

However, it must be considered that increasing the numbers of Australians entering one industry sector may have a detrimental effect on other sectors of maritime and other industries.

*Trainers* Good trainers take a significant period of time to develop, as their personal industry skills are focussed and honed, at the same time as their training and assessment skills are developed. A new lecturer does not become totally efficient for 2 or 3 years after commencement.

The maritime industry, from a Western Australian perspective, is currently booming. This appears mostly to be associated with various aspects of both the mining and offshore oil and gas sectors. Mariners provide support for both of these industries in terms of exploration, resource development, production (for example Floating Production, Storage and Offtake (FPSO) tankers or similar) and shipment of our natural resources. This has created pressure on the training system from two sides. On one side we have experienced a significant increase in demand for training in recent years (approximately 35% increase in training for seagoing employment and advancement since 2005). On the other side, the shortage of trained personnel in industry has resulted in continual approach to trainers to return to seagoing employment, often attracting significant (300%) increases in pay and conditions. This has resulted in both a reduction in the number and experience of trainers. TAFE, and probably other training providers, is seen as a recruiting opportunity for industry rather than its training arm, and therefore the lecturers we do attract and retain are here as a result of a strong vocational motivation, which is strained by alternative employment opportunity.

To expand the industry will also require an expansion of its training support. This can only be achieved by having a strong and ideally unified training system, supported by Governments, Regulators and industry, and focussed on achieving the best outcomes most economically by ensuring that trainers (as is the case in the airline industry for example) are the best available, not the only ones available.

*Training infrastructure* The current training infrastructure for maritime training in Australia is focussed across three delivery Centres at the International and Interstate level, and a wider range at the local levels. In addition infrastructure requirements include training berths on seagoing vessels of sufficient size as well as appropriate training resources. The shore based resources, with the exception of the Australian Maritime College, are contained within various TAFE and private sector organisations. The consequences of this is that training resources and infrastructure is mostly inadequate, inconsistent between training providers, and in many cases squeezed into existing delivery sites that it could be argued are mostly not fit for purpose. There appears clear evidence that the market sees shore-based training to be an Australia-wide issue rather than focussed in one location, but the facilities for training in most regions are inadequate.

There is a strong argument for the development of a single maritime training system for Australia, which could be adopted by different providers. This would concentrate efforts nationwide in the development of training resources, processes and practices. I believe a "Community of Practice" is the term for this, and I also believe it should be a funded requirement rather than an ideal.

*Training Program* The current process for determining training programs is via the Industry Skills Councils (Transport and Logistics with respect to maritime matters). They are tasked with the development and maintenance of the Maritime Training Package as the method by which training outcomes are determined to cover the knowledge and skills requirements of an industry. The maritime industry has a range of other indicators with respect to training standards including, but not limited to:

- IMO Convention on Standards of Training Certification and Watchkeeping and the associated STCW95 Code
- IMO Model (or sample courses)
- Commonwealth regulation (eg Marine Orders made under the Navigation Act)
- The National Standards for Commercial Vessels (Part D in particular)
- Pre-existing training programs of various vintages built up over a considerable period

Development of a training program to satisfy all of these outcomes in both a timely and economic manner is a nightmare. Of particular note is the Maritime Training Package (TDM07) being seriously inadequate in terms of the structure of competencies, many elements of competency and the underlying statements in the evidence guide and range statements. It is my opinion that the concept of a training package is sound, but the practice of development and update is seriously flawed, to the effect that training requirements are not adequately described and are certainly not efficiently maintained. (This is of course repairable, but it would take one or two maritime educators approximately a year to achieve, and would not be improved by a committee structure).

History has shown that the TP system takes too long to effect changes. The original MTP (TDM01) published in 2001 and subject to a supplement in 2002, was implemented in WA in 2004. In 2004 the training package review process commenced. The review was completed, at least as much as could be achieved at the time, in 2005 and the product of the review was published in 2007 as TDM07. Its full implementation may not occur for new students commencing training until late 2008. There appear no evidence of any further review being undertaken, despite the current inadequacy of the materials. Current efforts appear to revolve around skills-sets which are actually already in existence although the TLISC appear not to realise this!

It would therefore appear relevant in addressing strategies for development of an adequate skilled workforce to address the total of the above requirements, and the best way of doing this would be to implement a unified and professional system across the country.

**Robin Gray**  
**Program Manager Marine Operations and Engineering**

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