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26th April 2018

Domestic Commercial Vessel Levy Consultation
Maritime and Shipping Branch
Department of Infrastructure, Regional Development and Cities
GPO Box 594
CANBERRA CITY ACT 2601

Email – nmsr@infrastructure.gov.au

Dear sir/madam,

Consultation on exposure draft of Marine Safety (Domestic Commercial Vessel) Levy legislative instruments

QORF (the Queensland Outdoor Recreation Federation) is writing to provide input on AMSA's Consultation on exposure draft of Marine Safety (Domestic Commercial Vessel) Levy legislative instruments.

QORF is the peak body representing the interests of the outdoor community in Queensland. QORF has over 190 members, consisting of a range of outdoor industry stakeholders, including local governments, schools with an outdoor education focus, commercial operators and community organisations including Canoeing Queensland, Girl Guides Queensland, Scouts Queensland, and local/regional outdoor recreation bodies.

QORF's mission is to raise the profile, develop the capacity, and increase opportunities for outdoor recreation in Queensland.

Your [website](#) states that “the purpose of this consultation is ***intended to provide sufficient time for industry to review levy charges and fees*** and to support parliamentary debate of the related Marine Safety (Domestic Commercial Vessel) Levy Bills, which were introduced into Parliament on 28 February 2018.” [emphasis added] However, little or no consultation has been carried out with peak bodies who represent the interests of the outdoor community.

We became aware of the proposed removal of the exemption from the payment of annual levies for class 4 vessels through an email dated Friday 20th April 2018 – that email advised that the closing date for submissions was Monday 30th April 2018. This is not considered ***sufficient time for industry to review levy charges and fees***.

The opening paragraph of the email dated 20th April 2018 stated that “In the 2016 consultation—*Cost recovery for services under the National System for Domestic Commercial Vessel Safety*—it was proposed to exempt unpowered class 4 hire-and-drive vessels (such as kayaks, canoes, dragon boats and small sailing vessels) from the national system levy. Subsequent to those proposals, and based on further work, it is now proposed that these vessels be included in the levy scheme.”



QORF strongly objects to the proposed inclusion of unpowered class 4 hire-and-drive vessels in the levy scheme. QORF understands the need for government agencies to engage in cost recovery, however we question what evidence is available showing that business operators using these specific types of vessels are causing AMSA to incur costs.

We believe that including these craft in the levy scheme will have the effect of driving businesses away from the use of kayaks, canoes, dragon boats and small sailing vessels. This decision will cause some businesses to cease operations.

The proposed inclusion in the levy scheme by the Australian Maritime **Safety** Authority could have the ironic effect of reducing **safety** for participants in paddling and sailing activities. Small businesses currently deliver safety training to participants before allowing people to hire and use their craft. Small business operators deliver training and education to people regarding safe use of these types of craft.

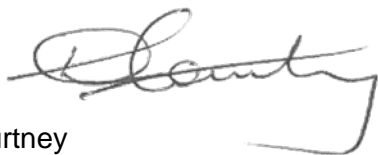
If operators are driven away from hire of paddlecraft and small sailing vessels and the costs increase for businesses which deliver training, then safety training will become less cost-effective and less readily available. If a business operator chooses to continue to hire these vessels to members of the public, it is expected that the costs of the levy would be passed on to the end users, making safety instruction a more expensive proposal – this would have the effect of reducing safety training for many members of the public.

Including unpowered class 4 hire-and-drive vessels in the levy scheme will dramatically affect many operators across the outdoor sector, whether in training, education or tourism. QORF strongly urges AMSA to reconsider the proposal to include unpowered class 4 hire-and-drive vessels in the levy scheme.

QORF would be pleased to engage with the department or AMSA in relation to this submission. We understand that this submission may be published as part of the community feedback process.

If further information is required, please contact us on 07 3369 9455 or eo@qorf.org.au.

Regards,



Dom Courtney
QORF Executive Officer

