

BOATSAFE TRAINING ASSOCIATION OF QUEENSLAND INC.



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Australian Communications and Media Authority

VHF Marine Radio Operator Qualification Arrangements
Recreational (Non-Commercial) Vessels

DISCUSSION PAPER (September 2009)

Boatsafe Training Association of Queensland Inc. (BTAQ)

The BTAQ is a non profit organisation comprising of representatives from Queensland (Qld) boat licence training organisations and providers authorised under the Boatsafe training scheme administered by Maritime Safety Queensland (MSQ) to deliver training courses, conducting training and assessment for members of the public as a pre-requisite for their issue of a Qld Recreational Marine Driver Licence (RMDL).

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BTAQ reply to questions raised in the discussion paper are as follows:

1. Is it the case that a significant number of recreational marine VHF radio operators do not hold a Certificate of Proficiency? What evidence is there about this issue?

BTAQ reply

Yes.

A large number of members of the public purchase a boat either privately or from a marine dealer or boat yard with a marine radio already fitted to the boat in the package supplied and don't bother to get a licence.

2. Why might recreational marine VHF radio operators not comply with the requirement to obtain Certificates of Proficiency? What could be done to improve compliance?

BTAQ reply

There is minimal to no education/advertising promoting radio licence courses or the requirement to hold a marine radio licence. There is also no enforcement of this regulation which is a large contributing factor for non compliance.

A more realistic radio course promoted, delivered and assessed by front line trainers such as boat licence training providers and volunteer rescue organizations (VMR) including Volunteer Coastguard groups.

3. What is the extent of awareness within the recreational marine community of the need to comply with the requirement to hold marine radio operator qualifications?

BTAQ reply

Very little due to no local organisations actively promoting these courses

4. What might be done to improve the accessibility of the training and examinations necessary for obtaining marine radio operator Certificates of Proficiency?

BTAQ reply

Give the authority to train and assess members of the public on the efficient operation of marine radio's to front line trainers who come in contact with them at the beginning of their boating life (licence trainers) or during use of their boat on the weekend (VMR groups).

5. How well known are existing options for training and education for the VHF Certificate of Proficiency (such as online courses)? How useful and accessible are these alternatives?

BTAQ reply

Not very well known.

The use of these courses are restricted to a small percentage of the new or existing boating public due to no local personal contact with trainers.

6. Are there ways that the existing examination and education structure could be improved? If so, please provide details.

BTAQ reply

The present invigilator system that Australian Maritime College (AMC) has in place relies on the student doing self study and fronting up to an authorised invigilator to sit their examination without any training from the invigilator.

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Most persons just want to do a course being trained and assessed during the course with a local organisation and a local trainer that they can ask questions to clarify any doubtful points with. Only then they feel confident to be assessed for their radio licence assessment. We also believe a practical component should be part of the training and assessment as this would be considered invaluable to the candidate to install confidence in the use of their marine radio.

7. Is it necessary for all operators of VHF marine radios to hold a Certificate of Proficiency?
a. To what extent do mandatory Certificates of Proficiency contribute to safety at sea for recreational VHF marine radio users?

b. Would it be appropriate to remove the requirement for a Certificate of Proficiency for marine radios on recreational vessels that are being used for limited purposes, such as operating in protected waters

BTAQ reply

We believe a radio licence should be required for operators of a VHF and a 27mhz marine radio.

A marine radio used correctly is no doubt an asset to improving marine safety both by monitoring vessel movements and especially important in the co-ordination of search and rescue operations.

No, we believe the removal of a marine radio licence in any waters would erode the efficiency in the usage of the VHF marine radio frequencies as it has done with 27mhz frequencies.

8. Is there an alternative to requiring Certificates of Proficiency that would be more effective in achieving safety outcomes sought by the marine community? How could recreational marine radio operators be more effectively informed about safety and how to effectively use their VHF radios?

BTAQ reply

A recreational marine radio licence.

We believe a 3 hour competency based training and assessment course, similar to the Qld Boatsafe licence course, could be easily developed covering all necessary aspects in the usage of 27mhz and VHF marine radio's for the recreational boat user as certain parts of the existing AMC examination is believed by us to be irrelevant (eg. SART's) for the average recreational boat and marine radio user. These courses could be delivered by local boat licence training providers and VMR groups.

9. Who is best placed to play the primary role in improving existing arrangements for marine radio operators, particularly given the existing infrastructure and relationship between the boating community and State and Territory based agencies?

BTAQ reply

State Government agencies are overloaded with responsibilities at the present time and it would be unfair to expect them to take on this Commonwealth role in addition to their already demanding state responsibilities.

AMC should maintain control on a national basis for the responsibility of the administration of marine radio licences with local trainers conducting courses.

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10. Could a nationally adopted qualification framework, administered by agencies closer to the marine sector than the ACMA, better meet the needs of the recreational boating community? Which agencies, government and non-government, are best placed to undertake and/or contribute to this exercise?

BTAQ reply

We believe that AMC is the appropriate organisation to administer the overall marine radio licence system on behalf of AMCA. The present more in depth examination arrangement is suitable for commercial maritime industry members.

But to increase the very poor numbers of licensed operators and low general knowledge of correct radio procedure we see the need for a more simplified, recreational marine radio licence course to cover 27mhz and VHF radios only. These courses could focus on correct marine radio procedures, frequencies and hands on setting up and usage of the marine radio. These courses could be efficiently delivered by local boat licence training providers and VMR groups and administered by AMC. These groups are the front line in the recreational marine industry and are the logical training organisations that have the infrastructure to administer these recreational marine radio licence courses on behalf of AMC and indirectly AMCA. This would effectively make it very convenient for members of the public to obtain their recreational marine radio licence from a local training provider who has credibility in this area.

11. Is there value in moving towards competency-based (practical) training and examinations?

BTAQ reply

Yes, there is merit in improving the marine radio training to meet the national standard, competency based training. This could be easily done with the introduction of a 3 hour recreational marine radio licence course covering both training and assessment. All BTAQ members have a commercial marine qualification, a Certificate IV in Assessment and Workplace Training, a Blue Card for working with children, and have undergone a criminal check by police and abide by our Code of Practice.

12. Is there scope to combine licensing for vessel operation and marine radio operation into a single licensing structure, such as State and Territory vessel operator licensing systems?

- a. How would that single licensing regime help to enable better safety outcomes?
- b. How best might the similarities in the processes be maximised to the benefit of recreation vessel operators?
- c. What are the compliance and enforcement capabilities and powers associated with current vessel operator licensing operations?

BTAQ reply

No.

- (a) No, marine radio must be a separate course.
- (b) Similarities are evident and obvious and they could be seen as similar to the Boatsafe licensing scheme. The marine radio licensing should not administered by a State Government agency.

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(c) Boat licensing is required by “State Legislation” enforced by “State Police and other State Government Agencies”. A recreational marine radio licence could be made mandatory and introduced in all state legislation making it easily enforced by the already existing state enforcement agencies.

13. What factors should the ACMA take into account in deciding whether or not to remove the mandatory requirement for VHF marine radio certificates of proficiency for recreational boaters?

BTAQ reply

If the removal of a marine radio licence is introduced it would have a serious impact and erode the efficiency of the use of all VHF radio frequencies with correct radio procedures being basically scrapped. No Licence, No enforcement the outcome would be No radio procedure discipline, and would seriously erode maritime safety.

May as well just use the mobile telephone as we would be constantly cut off, have to put up with bad language and spoken over by other radio users. This is now happening on 27mhz since the licence has been removed and is now too noisy to monitor in our opinion.

Gary McConnell
President

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Gordon Petersen

Gordon Petersen
Secretary

Any communication should be forwarded to the Secretary.