

2nd Attachment to Productivity Commissioners Enquiry into fishing.

Topic: Application for Certificate of Operation

Attached to this email is an application form for a Certificate of Operation, which all vessels operating in our sector must have by 1/7/2016.

Highlighted in yellow is section 3, Applicant status.

We question the nature of the CoO; on the one hand we understand that a CoO is required so the regulator can monitor vessels but on the other hand the information the application requests in section 3 is more in line with what would be of interest where a person is operating the vessel using his/her manning qualification.

So we wonder:

- Given that a CoO will only be issued to vessels that comply bearing in mind that the CoO will have to be on the vessel, if a vessel has a CoO we can assume it complies. Then considering section 3 of the application, can a prospective owner consider the CoO will be transferred if he buys the vessel?
- If the answer is no, then why is there not also a focus on what happens when the person in charge of the operation (skipper) changes?
- If the answer is yes, then why is there an interest in the applicant's status: it's about the boat not the status of the owner isn't it?

Our thoughts are:

Section 3 is more of a manning qualification topic. We would like to see Section 3 removed and the CoO remain focused on the safety of the operation. The safety of the operation automatically includes a requirement that the vessel be under the command of a person with the minimum manning certificates.

Robert Pender
Chair
The Fishermens Portal Inc.