



AUSTRALIAN MARITIME OFFICERS UNION

ABN 56 181 230 800

16 February 2018

Darren McCormick
General Manager – Asia Pacific
DOF Management Australia Pty Ltd
6th Floor, 181 St Georges Tce
Perth WA 6000

Via email: Darren.McCormick@dof.com

RE: Proposed Labour Agreement

Dear Darren,

At the outset it is important to state that this organisation wholeheartedly opposes your request for and the need for a labour agreement.

Furthermore, we do not accept your request to treat your application for the Labour Agreement as received in confidence. We intend to consult with our membership regarding this matter.

The Masters' and Deck Officers' labour market

On 18th April Ship's Master and Ship's Officer were removed from the 457 subclass visa lists as a response to evidence supplied by the AMOU of the significant number of highly qualified and experienced Masters and Officers actively and unsuccessfully seeking employment due to the continued inundation of foreign officers.

Following 18th April, Australian Masters and Officers should have been provided the opportunity to take up employment in their chosen field and showcase their skills and experience. Not only did this not happen but it became much worse for them. In addition to the vast number of 457 Masters and Officers still on the coast, without any market testing or consultation with AMOU, a sizeable echelon of foreign Officers illegitimately issued with 400 subclass visas appeared in the offshore oil and gas industry to further shut them out of the jobs.

By means of this labour agreement proposal, you're seeking to layer in a three-year complete shut-out deal with the government for your company's large chunk of the offshore oil and gas industry. We cannot accept this.

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The Government has recently accepted the realities of the seafaring labour market. On page 6 of the Regulation Impact Statement on the Coastal Trading (Revitalising Australian Shipping) Amendment Bill 2017 it states that:

'There is an oversupply of Australian seafarers, both ratings and officers, and a lack of training berths on Australian vessels.'

At today's date there are 917 Masters and Officers who are AMOU members and either paying to be on the employment roster, looking for work independently or without any designated employer. In addition to this, the internal mobility of Officers across contracts and employers that is the nature of the offshore industry can free up even more officers depending upon the timing of any job vacancies.

You will also be aware that there are Officers in this country who are not members of the AMOU. Whatever these three figures equate to represents the Australian professional mariners' job market. Consequently, this becomes a disturbingly large figure and when put into the context of a labour agreement renders the request unrealistic.

The numbers of Masters and Deck officers that you propose be covered by the Proposed Labour Agreement are staggering. You have listed the number of specialised vessels to be covered as 4, namely:

- Skandi Singapore;
- Skandi Acergy;
- Skandi Hercules; and
- Geoholm.

The manning scale for these types of vessels during operations has traditionally been 5, namely 1x Master, 2x Chief Officer/Senior DPO, and 2x Deck Watchkeeper (2nd Officer)/Junior DPO. Given the offshore works on an even time roster, translates to a total of 10 Officers per vessel.

Given that a Master or Chief Officer can, by virtue of their certification, sail in lower ranks your intention for 30 Masters and Chief Officers to be covered during the first year of the Proposed Labour Agreement means effectively that 3 of 4 vessels could, at any one time, be fully manned by non-Australian officers covered by the proposed agreement.

This is directly at odds with the undertaking by DOF Management Australia in the clause contained within the *DOF Management Australia Pty Ltd Deck Officers Maritime Offshore Oil and Gas Agreement 2016*:

*"12 Job Security
The employer will give local seafarers full, fair and reasonable opportunity to be employed in preference to non-local seafarers, subject to applicable laws."*

Experience and Education.

Your assertion in your letter that the majority of training of Masters and Deck Officers has occurred upon Bulk Carriers is simply untrue. The Australian "Blue-Water" fleet (which includes Bulk Carriers) has been in decline for the past 2 decades. Henceforth the training opportunities in this sector have also declined.

The Australian offshore sector has been the predominant trainer of Masters and Deck Officers in recent times, giving those individuals the experience and knowledge to undertake all tasks in the Offshore Oil and Gas Industry.

At *Attachment 1* and *Attachment 2*, you list the Responsibilities of the Master and the Chief Officer job classifications. These responsibilities form the basis of the job description for a Master and Chief Officer aboard any vessel. As such, the education component for all Masters and Chief Officers includes training as outlined in the training packages TDM60407, TDM50307 and TDMMO207A.

The list of competencies is included in the tables below and this training is audited by the regulator, AMSA. Additionally, prior to the issuance of any Masters or Chief Officers certification, each candidate must undergo an oral examination conducted by AMSA to test the candidates working knowledge of all of the criteria.

Employability Skills Summary for TDM60407 Advanced Diploma of Transport & Distribution (Maritime Operations - Master Unlimited)

The following table contains a summary of the employability skills as identified by the maritime industry for this qualification. This table should be interpreted in conjunction with the detailed requirements of each unit of competency packaged in this qualification. The outcomes described here are broad industry requirements that may vary depending on packaging options.

Employability Skill	Industry/enterprise requirements for this qualification include:
Communication	Establish and implement vessel's communication systems and Procedures <input type="checkbox"/> Listen to and interpret complex verbal information related to the operation, maintenance and management of the vessel <input type="checkbox"/> Read and interpret maritime regulations, charts, drawings, weather forecasts and charts, vessel's safety management system, vessel and equipment manufacturer's instructions, etc. <input type="checkbox"/> Speak clearly and directly on diverse and complex matters related to vessels operations, maintenance and management <input type="checkbox"/> Write complex documents including reports on vessel operations and maintenance, safety incident reports, entries in vessel's official log, etc. <input type="checkbox"/> Negotiate complex issues with others in the course of vessel operations <input type="checkbox"/> Recognise and interpret non-verbal signs, signals and behaviour <input type="checkbox"/> Interpret and record observations and equipment readings and displays <input type="checkbox"/> Communicate with multilingual crew <input type="checkbox"/> Use bridge communication equipment and GMDSS radio equipment
Teamwork	<input type="checkbox"/> Provide leadership to the crew of the vessel <input type="checkbox"/> Manage the resolution of any interpersonal conflicts that may arise on board the vessel <input type="checkbox"/> Motivate crew members <input type="checkbox"/> Assist crew members to achieve and maintain competency <input type="checkbox"/> Manage the avoidance and prevention of harassment of others on the vessel <input type="checkbox"/> Collaborate with crew members in the course of vessel Operations <input type="checkbox"/> Manage crew members of different ages, genders, race, religion, political persuasion, etc.
Problem Solving	<input type="checkbox"/> Identify and solve or report complex problems arising in the course of vessel operations <input type="checkbox"/> Monitor and anticipate problems that may occur in the course of vessel operations including hazards and risks and take appropriate action (e.g. collision avoidance strategies, avoidance of navigational hazards, etc.) <input type="checkbox"/> Manage hazards and risks in complex and diverse situations (e.g. navigation hazards, crew working in confined spaces, navigating heavy weather and seas, etc.) <input type="checkbox"/> Use advanced diagnostic and analysis techniques required when managing maintenance program for vessel's propulsion, electrical and auxiliary systems in conjunction with the chief engineer and other crew members on the vessel <input type="checkbox"/> Use mathematics to solve complex problems such as vessel's stability and loading calculations, fixing of vessel's position,

	and planning and plotting a vessel's course
Initiative and enterprise	<ul style="list-style-type: none"> ☐ Modify activities dependent on differing work situations and contingencies such as changes in the weather and sea conditions, different loading conditions and navigation in different waters ☐ Take appropriate initiatives in complex and diverse situations such as those above ☐ Manage responses to any changes in vessel's equipment, standard operating procedures and the vessel's working environment
Planning and organising	<ul style="list-style-type: none"> ☐ Establish operational and emergency plans, systems and procedures for the vessel, including the vessel's safety management system and emergency procedures ☐ Establish and implement systems and procedures for maintaining compliance with regulations and codes of practice ☐ Establish and implement bridge resource management strategy ☐ Monitor and evaluate operational performance and compliance ☐ Collect, manage and interpret information needed to plan and organise operations ☐ Organise and plan own management activities as master of the vessel ☐ Manage time and priorities in the course of management activities on the vessel
Self-management	<ul style="list-style-type: none"> ☐ Interpret and apply regulations, survey requirements, standard procedures and codes of practice as they apply to the vessel, including OH&S, environmental protection, security and SOLAS requirements ☐ Establish and follow own work plans and schedules ☐ Evaluate and monitor own work and management performance as master of the vessel
Learning	<ul style="list-style-type: none"> ☐ Plan and organise learning and assessment activities on the vessel, including emergency drills, safety and security awareness training, and continuing professional development of crew members ☐ Manage adaptation of crew members to any changes in the vessel's systems, equipment, procedures and the vessel's operating environment (e.g. sea and weather conditions) ☐ Instruct, coach or mentor other crew members on the vessel ☐ Contribute to the assessment of the competency of other crew members ☐ Create a learning environment on board the vessel ☐ Adapt own competency to any changes in the vessel type, its equipment and its operating environment ☐ Update own knowledge and skills required for management activities
Technology	<ul style="list-style-type: none"> ☐ Operate complex equipment and systems including vessel's propulsion and auxiliary systems, GMDSS radio systems, radar and other bridge and electronic navigation systems, etc. ☐ Establish and implement operational and maintenance systems for the vessel's hull, propulsion and auxiliary systems, safety and deck equipment and other facilities on the

	vessel <input type="checkbox"/> Establish safety management system and OH&S procedures for use and maintenance of equipment and facilities <input type="checkbox"/> Manage the preventative and remedial maintenance of vessel's hull, plant, equipment and tools
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In addition to the above skills, the holder of a Masters or Chief Officers qualification must have held a Deck Watchkeepers certificate for a period of time prior to the issuance of those certificates. The skills summary for this qualification is as follows.

Employability Skills Summary for TDM50307 - Diploma of Transport & Distribution (Maritime Operations – Deck Watchkeeper)

The following table contains a summary of the employability skills as identified by the maritime industry for this qualification. This table should be interpreted in conjunction with the detailed requirements of each unit of competency packaged in this qualification. The outcomes described here are broad industry requirements that may vary depending on packaging options.

Communication	<input type="checkbox"/> Use vessel's bridge communication systems and procedures <input type="checkbox"/> Listen to and interpret verbal information related to bridge watchkeeping functions and the operation and maintenance of the vessel <input type="checkbox"/> Read and interpret maritime regulations, charts and drawings, bridge equipment readings and displays, vessel's safety management system, vessel and equipment manufacturer's instructions, etc. <input type="checkbox"/> Speak clearly and directly on diverse matters related to bridge watchkeeping functions and vessel operation and maintenance <input type="checkbox"/> Write documents as part of bridge watchkeeping duties, including reports on bridge operations, incident reports, entries in records, etc. <input type="checkbox"/> Negotiate issues with others in the course of bridge operations <input type="checkbox"/> Recognise and interpret non-verbal signs, signals and behaviour <input type="checkbox"/> Interpret and record observations and equipment readings and displays <input type="checkbox"/> Communicate with multilingual crew <input type="checkbox"/> Use bridge communication equipment and radio equipment
Teamwork	<input type="checkbox"/> Provide leadership to the personnel on the vessel <input type="checkbox"/> Resolve any interpersonal conflicts that may arise on board the vessel <input type="checkbox"/> Motivate other crew members <input type="checkbox"/> Assist crew members to achieve and maintain competency <input type="checkbox"/> Avoid and prevent the harassment of others on the vessel <input type="checkbox"/> Collaborate with crew members in the course of vessel operations

	<ul style="list-style-type: none"> ☑ Work with crew members of different ages, genders, race, religion, political persuasion, etc.
Initiative and enterprise	<ul style="list-style-type: none"> ☑ Identify and solve or report problems arising in the course of bridge watchkeeping operations ☑ Monitor and anticipate problems that may occur in the course of watchkeeping operations including hazards and risks and take appropriate action (e.g. avoidance of collision, avoidance of navigation hazards, avoidance of environmental pollution, etc.) ☑ Manage hazards and risks in a range of bridge watchkeeping situations, (e.g. collision avoidance, navigation hazards, heavy weather and seas, etc.) ☑ Use mathematics to solve problems such as various calculations related to navigation, position fixing and other watchkeeping duties and functions
Problem Solving	<ul style="list-style-type: none"> ☑ Modify activities dependent on differing work situations and contingencies such as changes in the weather and sea conditions, changes in operational performance of bridge equipment and navigational emergencies ☑ Take appropriate initiatives in a range of bridge situations such as those above ☑ Respond appropriately to any changes in bridge equipment, standard operating procedures and the vessel's working environment
Planning and organising	<ul style="list-style-type: none"> ☑ Follow and apply operational and emergency plans, systems and procedures for the vessel, including the vessel's safety management system and emergency procedures ☑ Monitor systems and procedures for compliance with regulations and codes of practice ☑ Implement bridge resource management strategy ☑ Monitor and evaluate operational performance and compliance ☑ Collect, manage and interpret information needed in the course of bridge operations ☑ Organise and plan own management activities as Deck Watchkeeper on a vessel ☑ Manage time and priorities in the course of bridge watchkeeping activities
Self-management	<ul style="list-style-type: none"> ☑ Interpret and apply regulations, survey requirements, standard procedures and codes of practice as they apply to watchkeeping operations, including collision avoidance, OH&S, environmental protection, security and SOLAS requirements ☑ Establish and follow own work plans and schedules ☑ Evaluate and monitor own work and management performance as watchkeeper (deck) on the vessel
Learning	<ul style="list-style-type: none"> ☑ Contribute to learning and assessment activities on the vessel, including emergency drills, safety and security awareness training, and continuing professional development of crew members ☑ Assist crew members to adapt to any changes in the vessel's

	<p>systems, equipment, procedures and the vessel's operating environment (e.g. sea and weather conditions)</p> <ul style="list-style-type: none"> ☑ Assist in the instruction, coaching or mentoring of other crew members on the vessel ☑ Contribute to the assessment of the competency of other crew members ☑ Assist in the creation of a learning environment on board the vessel ☑ Adapt own competency to any changes in the vessel type, its bridge equipment and its operating environment ☑ Update own knowledge and skills required for bridge watchkeeping activities
Technology	<ul style="list-style-type: none"> ☑ Operate bridge equipment including steering and navigation systems, radar and other electronic navigational aids, radio systems, safety management equipment, etc. ☑ Follow and apply operational and maintenance systems for the vessel's hull, propulsion, electrical and auxiliary systems, safety and deck equipment and other facilities on the vessel ☑ Follow and apply safety management system and OH&S procedures for use and maintenance of equipment and facilities ☑ Carry out the preventative and remedial maintenance procedures for the vessel's hull, propulsion plant, electrical and auxiliary systems, other engine room equipment and tools

Additionally, Ship Security Officer training must be completed by all Officers prior to obtaining or renewing a Certificate of Competency. Training Package TDMMO207A list the requirements as tabled below.

Required Skills	<ol style="list-style-type: none"> 1. Communicate effectively with others on matters related to vessel and port security 2. Read and interpret instructions, procedures and other information relevant to the role and responsibilities of a ship security officer 3. Select and use appropriate communications equipment when carrying out the role and responsibilities of a ship security officer 4. Interpret and apply security and safety practices and regulations 5. Complete documentation and reporting requirements on matters related to vessel security 6. Coordinate the development, implementation and modification of a ship security plan for a vessel 7. Work as a team with others on matters relevant to the maintenance of vessel and port security 8. Take appropriate initiatives related to vessel and port security within limits of role and responsibility 9. Organise and conduct vessel security assessments, audits and inspections 10. Monitor and anticipate security problems and risks and take appropriate action
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	<p>11. Modify activities dependent on differing workplace and security contingencies, risk situations and potential threats</p> <p>12. Identify and solve problems and potential threats associated with the maintenance of vessel and port security</p> <p>13. Report security issues and threats and take appropriate action based on available information and procedures</p> <p>14. Instruct vessel personnel on security responsibilities and ways of maintaining security awareness and vigilance using appropriate methods</p> <p>15. Operate, test, calibrate and maintain specific security equipment used on a particular vessel</p>
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The AMOU acknowledges the TDM packages have been superseded by the MAR training package. Little has changed to the training itself, but the package description has been somewhat simplified. For the purposes of clarity we have used the TDM packages. Note also the content of these courses comply with the International Standards of Training, Certification and Watchkeeping. Australia is internationally recognised for having one of the most stringent regimes in auditing and verification of Maritime Qualifications.

As can be seen from the competencies required by the training packages above, all Australian Masters and Chief Officers inherently possess the necessary skills to satisfy the requirements DOF have outlined under the titles of Responsibilities in *Attachment 2* and *Attachment 3* by virtue of their training and education.

Dynamic Positioning.

The International Marine Contractors Association (IMCA) *Training and Experience of Key DP Personnel* you refer to in your proposal sets out in the table below the minimum period of familiarisation that historically has been found to be satisfactory on the deck side for Officers joining a new or unfamiliar vessel:

Key DP personnel	Minimum Vessel Experience
Master/Offshore Installation Manager	50 hours - over 7 days at sea
Senior Dynamic Positioning Officer	50 Hours - over 7 days at sea
Dynamic Positioning Officer	50 Hours - over 7 days at sea

The DP hours above can be reduced if a simulator of the DP control system is available together with a structured and supervised training programme.

Further to these requirements, the provisions within IMCA M117 are the provisions for familiarisation on a familiar vessel. A familiar vessel is considered in these guidelines as one that has the same DP control system.

For new personnel joining a vessel with a familiar control system that carries out critical operations such as diving support, drilling or operations close to installations, there should be a minimum period of familiarisation, as outlined in Table 3. This familiarisation activity should include a structured plan comprising a supervised programme of onboard familiarisation followed by assessment through a company authorised procedure.

Key DP Personnel	Minimum Familiarisation Period	
Master/OIM	24 DP hours	3 days at sea
Senior DPO	24 DP hours	3 days at sea
DPO	24 DP hours	3 days at sea

It is noted in the Proposed Labour Agreement, that you refer to your Multi-Purpose Support vessels. A look at the specifications for these vessels on your company's website reveals the vessels are equipped with the following DP control systems.

Vessel	DP Control System
Skandi Singapore	Kongsberg KPOS DP-21
Skandi Hercules	Kongsberg KPOS DP-21
Skandi Acergy	Kongsberg KPOS DP-21
Geoholm	Kongsberg SDP-22

It is noted that once an officer has had initial familiarisation upon all but one of your vessels, then the Officer is almost immediately ready to perform their duties on other vessels within your fleet.

In terms of timeframe, the Internationally recognised guidelines for the experience and familiarisation required to perform the duties aboard these vessels can be measured in days not the 3 years for which you seek in the Proposed Labour Agreement.

AMOU Offshore Oil and Gas Industry Skills Survey

In order to refine our offshore oil and gas industry figures and with particular reference to DP qualifications and experience, we are in the process of conducting a survey of the qualifications, skills and experience within our membership. These results also include those Officers to whom the survey has been forwarded:

Level of DP certification

Certification Level	% of Respondents	# of Respondents
Unlimited DP operator	63.64%	203
Limited DP operator	2.51%	8
Advanced DP	11.29%	36
Basic DP	10.03%	32
None	11.29%	36
Other (please specify)	1.25%	4
Respondents (so far)		319

DP Experience

Years of Experience	% of Respondents	# of Respondents
<less than one year	5.5%	11
1 year – 3 years	23.5%	47
3 years – 5 years	24.5%	49
5 years plus	46.5%	93
Respondents (so far)		200

Type of DP operations in which respondent has experience

Type of Operation	% of Respondents	# of Respondents
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Platform supply / support including anchor handling (AHTS)	66.05%	214
Platform supply / support (PSV)	69.44%	225
Saturation dive support	16.67%	54
Air dive support	20.68%	67
ROV Support	54.94%	178
Pipe lay Operations	20.68%	67
Flexi -lay operations	16.36%	53
Well intervention	14.20%	46
General subsea construction (Subsea Crane)	31.17%	101
Subsea construction (Heavy lift 500 ton plus)	13.27%	43
Inspection Repair Maintenance (IMR)	29.32%	95
Accommodation vessel	13.58%	44
Accommodation Vessel (Semi-submersible)	4.63%	15
Semi-submersible Rigs (Drilling)	4.32%	14
Drill ship (Drilling, core sampling)	12.96%	42
Dredging / Rock Dumping	12.65%	41
DP shuttle tanker	3.70%	12
Offshore Wind farms	1.54%	5
Other (please specify)	22.84%	74
Respondents (so far):		324

Total logged DP hours under the IMCA system (note NI days basis not included in this table)

Span of hours	% of Responses	Number of Officers
Up to 5,000	70.20%	106
5,000 – 10,000	12.58%	19
10,000 – 20,000	16.55%	25
20,000+	0.67%	1

This survey was open to AMOU members and given that our records currently have 598 members who identify as working in the Offshore Oil and Gas Industry, this survey represents roughly 50% of the known workforce.

Upon interpretation, the data would suggest that between a third and a half of the workforce possess the skills and experience to operate the types of vessels you have identified. Furthermore, over 70% of the workforce has in excess of 3 years of general DP experience. As your proposal states a minimum of 2 years DP experience for a Chief Officer and presumably a Master, the Australian skill set is well and truly capable of supplying the officers with the experience you seek.

The AMOU approach

Our approach to labour agreements is negative because we are thoroughly unconvinced that there is a sufficiently robust system used by employers in our industry to genuinely account for the alleged merits of the ex-pat over the local officer. In terms of Masters and Officers, offshore sector employers have had a relatively easy run.

Certainly, once the 400 subclass abuse became the trend, the local labour market was totally ignored and so was the AMOU. Our position is that there needs to be genuine labour market testing but the process needs to be much further refined than just this. We wonder in each case exactly what

competencies it is that a company or the client actually need and where this is documented, if it is at all. In order to achieve a high level of rigor in relation to the process, the AMOU believe the following steps should be undertaken:

1. The company should apply to the department for an appropriate visa and provide the CV of each individual ex-pat officer for whom a visa application is contemplated; then
2. This CV must be assessed alongside the position description specified in the vessel's Safe Management System (with revision numbers and dates also specified); then
3. If these are consistent, an independent assessor should undertake a Verification of Competency exercise overseas for any ex-pats for whom a visa may be sought, prior to any visa application being made; then
4. Genuine labour market testing should be undertaken to find a local Officer with a CV to match the position description in the SMS using all available media and industry sources; then
5. If these genuine attempts have failed to find such a local Officer the AMOU should be consulted to identify suitable candidates; then
6. Following this process if no local officer can fulfil all of these requirements, a visa may be sought for the ex-pat specialist that has successfully undergone the process in steps 1-3 and a short-term engagement agreed for the ex-pat to train an Australian in the role; then
7. The most suitable local Officer will be employed into the position (subject to step 8 below); then
8. Any local employed will be subjected to the same Verification of Competency process using the same independent assessor; then
9. If the local Officer is successful, his/her employment becomes unconditional and he/she takes up the position with the ex-pat specialist alongside in a training and advisory role so that the specialist skills can be passed on.

Short of implementation of this system, a Labour Agreement is unconscionable to the AMOU and is a by-pass mechanism designed to circumvent local labour.

As an adjunct to our approach we are looking at training in a holistic fashion and will be endeavouring to ensure there is no possible future shortfall in qualified and experienced personnel and those with the specialist niche qualifications and experience so heavily relied upon by employers to justify bypassing Australian Masters and Officers.

The offshore as an industry has over a number of years failed to accept an obligation to train and provide Officers with the certification and skills needed for the advancing industry. An over-reliance on use of non-local seafarers to fill the position rather than investing in skills development has left companies exposed when the legislation was tightened up.

Summary

We are looking forward to assisting you to achieve your foremost priority of employing Australian labour but we will not be doing this by extending any support for the proposed labour agreement. We see an industry training programme as key to securing the future supply not labour agreements. The Australian Masters and Officers labour market the proposal seeks to circumvent is substantial.

Notwithstanding the exaggeration of experience levels you state that are required in comparison with the international industry guidelines, the experience you seek exists within the local Officer labour market. Our survey is increasingly demonstrating the breadth of local skills and experience available to the offshore industry.

This highlights the ongoing injustice of so many 457 and 400 visa-holders occupying Australian jobs and we refuse to multiply the shut-out mechanisms by adding a labour agreement into the mix. The DP/Multi Purpose Support area is very well served if this local market is genuinely tapped.

In many instances the justification for getting foreign Officers fails to stack up on-board the vessels either from the DP or wider maritime skills perspective. We will always assist DOF to source suitable Australians and where the local market cannot generate that exceedingly rare maritime specialist, we have a fair process to apply.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Pearson', with a stylized flourish extending to the right.

Dan Pearson

Secretary - Western Area

AUSTRALIAN MARITIME OFFICERS UNION