



AIMPE

Australian Institute of
Marine and Power Engineers
HEAD OFFICE

MED & Class 3 Engineers: OUR Future

The Institute's vision is that in the future 50%+ of AMSA-issued engineering certificates will be issued to Engineers who have come through from Marine Engine Driver ("MED") to Class 3 Engineer and then achieve AMSA Engineer Watchkeeper certification.

What stands in the way?

1. Colleges unwilling to give recognition of prior learning ("RPL") for the academic and workshop content of the Class 3 certificate held, and unwilling to provide an academic bridging course to Watchkeeper instead of requiring that the Class 3 start all subjects from scratch; and
2. Too many variations in the academic standard and workshop standard and sea service standard between each of the States + NZ; and
3. AMSA position that if a course or qualification was done more than 10 years ago it does not count and you have to do it again.
4. No path for Class 3 Engineers who don't have an approved Trade.

Action for Class 3 Engineers who don't have an approved Trade.

The Institute believes action on item 4 must come first. When enough Class 3s (with NO Trade) are coming through to make up the numbers for a complete college-course then we will have the critical mass to press colleges on RPL.

Since 2008 AIMPE has been proposing to AMSA that a 'bridge' must be built between the engineering certificates issued under the State system and those under AMSA. In 2009 AMSA agreed to our proposal that the holder of an Engineer Class 3 certificate (with 30 months seagoing maintenance experience holding that Class 3) would be **deemed** to meet the Trade-entry requirements to go to college to do the Watchkeeper certificate. Class 3 Engineers would simply go to college and do the Watchkeeper subjects + workshop and if AMSA accepts the propulsion power of the vessels served on as fulfilling the Watchkeeper sea service requirements then as soon as the college passes are achieved they could sit their AMSA Orals for issue of the Watchkeeper certificate.

Subsequently AMSA, apparently under some political influence, reneged on this agreement, and released the 2011/2012 Consultation-Draft Marine Orders Part 3 ["MO 3"] attacking existing training standards.

AMSA desisted from that Consultation-Draft MO 3 only when the draft MO 3 was blocked in Parliament by Independent MPs and Opposition (Nationals & Liberals). But there is nothing to prevent AMSA from repeating this after the September 14 elections, particularly if independents no longer hold the balance of power.

So AIMPE has drafted and sought support for the MARINE ENGINEERS QUALIFICATIONS BILL 2013 which, if passed by the Parliament, would:

- firstly implement the 2009 agreed engineering reforms including the 'bridge' from Class 3 to Watchkeeper.
- Secondly the Bill would prevent AMSA from lowering most of the MO 3 standards that they attacked. These include preventing the reduction of the 36 months training time for a Cadet to become an Engineer Watchkeeper [that 36 months has NOTHING to do with Class 3 Engineers by the way, only Cadets], requirement for Orals Exams before issue of a Certificate, requirement that the Orals be conducted by an AMSA Examiner, requirement that AMSA Principal Examiner of Engineers personally conduct the audit of approved colleges/courses, ensure that any engineer certificate [Steam or Motor] of any grade can be revalidated by service on any vessel of at least 750kW, and so on.
- Thirdly, the Bill has also had to have regard to the changed application of MO 3 as a result of the repeal of the Navigation Act 1912 and replacement by the Navigation Act 2012 which only applies to ships that trade internationally! **Except for the 7 ships which trade internationally, all vessels which were previously under the Navigation Act 1912 now fall through to the National Law/State-system..... to a lower standard in which MO 3 does not apply at all....unless the owner voluntarily opts-in to the Nav Act 2012 & MO 3 !**

So the mix-up of big vessels and little vessels in the National Law/State-system needs some resolution, so AIMPE proposed a break-point of 500GRT or 3000kW propulsion power on the STCW aggregation method. If the aggregate propulsion power is 3000kW or more [or the vessel is 500 GRT or more] then this Bill would apply. If less, then the Bill will not apply to the National Law vessels.

You also need to be aware the new National Law/State-system will NO LONGER TRIGGER THE MO 3 STANDARDS when State borders are crossed, so **the jobs-market-demand for Class 3 and MED 1 certificates will be much reduced.**

Additionally, when you analyse AMSA's plans for the National Law/State-system [from AMSA's "Information Paper 15"] to reduce current State-system certificate requirements across the board this will deliver **a second blow to the need for Class 3 and MED 1 certificates.** See the Table below. Also, for some reason Class 3 certificates have disappeared from both the National System and from MO3.... we trust that is just another typographical error on AMSA's part?

Consider a commercial vessel, of less than 35 metres, with **2 similar main engines and 2 screws** as per the Table:

| Propulsion Power NSCV (only ONE engine counted if engine runs at > 1200 RPM) | Propulsion Power STCW (actual propulsion: all engines counted) | Area of Operation | Required certificate to be Chief Engineer as per NSCV | Impact of National System to be Chief Engineer as per Information Sheet 15 | Required certificate to be First Engineer as per NSCV | Impact of National System to be First Engineer as per Information Sheet 15 |
|--|---|--------------------------|--|---|--|---|
| 3000kW and over | 6000kW and over | unlimited | Refer Marine Orders | | Refer Marine Orders | |
| 1500kW but < 3000kW | 3000kW but < 6000kW | 200 NM 30 NM | Engineer Class 3 | No mention Class 3? | <i>Engineer Class 3</i> | No mention Class 3 ? MED 1 out to 30 NM |
| 1000kW but < 1500kW | 2000kW but < 3000kW | 600 NM 30 NM | Engineer Class 3 | MED 1 out to 200 NM | MED 1 | MED 1 MED 2 or MED 3 out to 200 NM |
| 750kW but < 1000kW | 1500kW but < 2000kW | 600 NM 30 NM | Engineer Class 3 MED 1 | | MED 1 MED 2 | MED 3 out to 200 NM |
| 500kW but < 750kW | 1000kW but < 1500kW | unlimited | Engineer Class 3 | | Engineer Class 3 | |
| | | 600 NM | MED 1 | MED 2 out to 200 NM | MED 1 | |
| | | 30 NM | MED 2 | MED 3 out to 200 NM | MED 2 | |
| 250kW but < 500kW | 500kW but < 1000kW | unlimited | Engineer Class 3 | | MED 1 | |
| | | 600 NM | MED 2 | MED 3 out to 200 NM | MED 1 | |
| | | 30 NM | MED 3 | | MED 3 | |
| <250kW | <500kW | unlimited | Engineer Class 3 | | MED 1 | |
| | | 600 NM | MED 2 | | MED 1 | |
| | | 30 NM | MED 3 | | MED 3 | |

The Table shows that a vessel under the current State system / National Standard for Commercial vessels (“NSCV”) that has 2 x 2900 kW engines currently requires a **Class 3** as First Engineer [see *Italic* text in Table] but under the new National System [according to AMSA’s Information Paper 15] will only require an **MED 1 to be First Engineer, out to 30 NM**.

Unless they are at least 500 GRT, our Bill will only affect vessels in the grey shaded area in the Table above.

So our Bill will ONLY be able to help against the reduced demand for Class 3 and MED 1 certificates shown in the GREY-shaded rows of the Table and it is hoped that when we see a certificate-Table from AMSA that actually re-inserts the Class 3 certificate that we can use the STANDARD in our Bill about definition of “Propulsion Power” (on the STCW-basis of total propulsion power) to stop this erosion of the need for Class 3 certificates by forcing AMSA to look one level higher in the National-System Table. We hope this will re-instate the need for Class 3 certification instead of the shown drop to MED for such powerful vessels [i.e. within the grey-shaded rows of the Table].


The 500 GRT and 3000 kW cut-off in our Bill means we cannot prevent that a vessel under the current State system / National Standard for Commercial vessels (“NSCV”) that has 2 x 1400 kW engines, currently requiring a **Class 3** certificate as Chief Engineer [see yellow highlighting], under the new National System [according to AMSA’s Information Paper 15] will only require an **MED 1 to be Chief Engineer**.

Similarly, we will not be able to prevent that a vessel currently under the State system / NSCV e.g. with 2 x 900 kW engines, currently requiring an **MED 1** as First Engineer [see underlined text in Table], under the new National System will only require an **MED 3 to be First Engineer**.

Current State-system vessels crossing a State border trigger application of all of MO3, and under the National System that will no longer happen. If our Bill becomes law it won’t re-apply the MO 3 Nav Act/MO3 standards but will apply just 15 Standards to State-system/National-Law vessels which are > 3000kW / 500 GRT.

The Standard of most concern to you being the Standard defining “Propulsion Power”. The anticipated effect on the manning scale in the Table above is that the reduction in standards from Class 3 to MED may be stopped, and so the value of your certificate in the jobs-market may be re-instated. The effect can only be estimated, as AMSA no longer shows Class 3s in either the Marine Order nor in the National System, but **if ANY AIMPE member with an MED or Class 3 stands to lose their job as an outcome of our Bill, as we try to protect your engineering interests, you can count on AIMPE being in YOUR CORNER and speaking up to help ensure YOU are not disadvantaged. That’s a commitment.**

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Australian Institute of Marine & Power Engineers