



AUSTRALIAN INSTITUTE OF MARINE & POWER ENGINEERS
Western Australian Branch

Honorary Secretary: Chris Blackmore – Assistant Federal Secretary: Andrew Williamson
National Organiser: Michael Carroll

13 February 2018

Mr Darren McCormick
General Manager-Asia Pacific
DOF Management Australia Pty Ltd
6th Floor
181 St Georges Terrace
Perth WA
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Dear Mr McCormick,

We refer to your correspondence dated 1 February 2018 concerning a proposed Labour Agreement for Chief Engineers and First Engineers.

At the outset please be advised that we do not accept your request to treat your application for the Labour Agreement as received in confidence. We propose to consult with the membership regarding this matter.

Australia is a free and open democracy and matters such as these should always be open to scrutiny – especially by those who are adversely impacted by the proposal. Vested interests should not be able to hide behind a self-declared veil of secrecy.

We object to the granting of such an Agreement by the Department of Immigration and Border Protection.

We turn to the extraordinary assertion by DOF that Australian candidates do not hold the relevant experience, competencies or knowledge such as to enable them to work on the tonnage owned or operated by DOF. Unsurprisingly you provide no empirical data to support your contention as it is without foundation.

Various institutions in Australia provide Dynamic Position Maintenance Courses for Marine Engineers and ETOs who are responsible for the on board maintenance of dynamic position equipment. To illustrate, both the Australian Maritime College at Launceston, Tasmania and the Farstad Shipping Offshore Simulation Centre in Perth.

Both offer their DP training services to amongst others, Australian Deck and Engineering Officers.

We are enclosing some general information about the Farstad Shipping Offshore Simulation Centre and specifically about the Kongsberg K-POS Maintenance Dynamic Positioning Course.

As this is a very short course it would be more than feasible for any Australian employer to sponsor its employees to undertake the course here in Australia. How many Engineers has DOF sponsored through either of the Australian DP Maintenance courses in the last three years?

We are also enclosing Certificates of Training of an AIMPE member who has completed both the Kongsberg and the Rolls Royce DP Maintenance courses. In the upcoming consultations with the Department we will be in a position to provide them, and DOF, with multiple examples of various other Marine Engineers who have also completed these courses.

Based on IMO publication 645 the Classification Societies have rules for dynamically positioned ships described as Class 1, Class 2 and Class 3. Importantly for the purposes of our objection to the issuance of the Labour Agreement sought by DOF, the completion of either of the abovementioned courses entitles that Marine Engineer to serve in all three classes of dynamically positioned ships.

DIFFERENCE BETWEEN DP CLASS 1, 2 AND 3

For equipment class 1, loss of position may occur in the event of a single fault

For equipment class 2, a loss of position is not to occur in the event of a single fault in any active component or system.

Single failure criteria include:

- Any active component or system (generators, thrusters, switchboards, remote controlled valves, etc.).
- Any normally static component (cables, pipes, manual valves, etc.) which is not properly documented with respect to protection and reliability.

For equipment class 3, a single failure includes:

- Items listed previous for class 2, and any normally static component is assumed to fail.
- All components in any watertight and fire protected compartment, exposed from fire or flooding.

Competency recommendations are given in the table below. (**reference** International Guidelines for The Safe Operation of Dynamically Positioned Offshore Supply Vessels Rev. 1 –August 2009, Offshore Oil and Gas Industry International Cross Industry Workgroup)

Chief Engineer	<ul style="list-style-type: none"> • STCW 95 engineering officer certificate appropriate for class of vessel. • Adequate experience on the vessel type – recommend 14 days. • Adequate experience of the DP system type – recommend 14 days. • Detailed knowledge of the vessel's DP FMEA (Failure Mode Effect Analysis) and adequate knowledge of the vendor manuals. • Knowledge and understanding of failure modes. • Knowledge of the maintenance requirements for DP systems. • Adequate knowledge of the vessel's DP operating manual.
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	<ul style="list-style-type: none"> • Knowledge of relevant IMCA guidelines including DP incident reporting. • Consideration should also be given to providing manufacturers' courses for chief engineers, particularly for the DP control system and maintenance requirements and, where applicable, power generation, power management and propulsion systems
Watchkeeping Engineer	<ul style="list-style-type: none"> • STCW 95 engineering officer certificate appropriate for class of vessel. • Adequate knowledge of the vessel's DP FMEA and vendor manuals. • Adequate experience of vessel type and nature of DP operations. • Knowledge and understanding of failure modes.
Electricians and electro technical officer	<ul style="list-style-type: none"> • Detailed knowledge of the vessel's DP FMEA and adequate knowledge of the vendor manuals. • Consideration should also be given to providing manufacturers' courses for electricians/electronics officers, particularly for the DP control system and, where applicable, power generation, power management and propulsion systems. • Knowledge and understanding of failure modes.

Table 4 – Competency recommendations for engineers, electricians and electro technical officers on DP OSVs

Owners should always have on board at least one engineer or electrician who has received adequate training to ensure competence and knowledge of the control systems of the vessel (DP, PMS, ICS, AVM etc.), so that there is a first level of response to a problem on board and a person well qualified to execute recommendations from the vendors of such equipment when further help is needed.

WHAT EXPERIENCE IS NECESSARY FOR ENGINEERS

In the past various vessel operators have ensured local Engineers accrue sufficient experience by early placement on vessels prior to their deployment to Australia (the mobilisation phase when a vessel is to voyage from a Foreign Port to Australia). This could be undertaken on a secondment basis.

As per the -International Marine Contractors Association M 117-The-Training-and-Experience-of-Key-DP-Personnel, Revision 2, September 2016, (IMCA M 117 Rev. 2) reference is made to the Table 8.1 below over recommendations of experience:

The example of operations near to an installation, or for installations that are DP controlled, is used for convenience, but clearly there could be a wide range of operating parameters for DP vessels.

When a vessel changes owners and/or operator, or is deployed in a new area, it may be difficult to crew the vessel with adequately experienced and trained personnel. It would thus be necessary to establish appropriate adequate vessel experience as quickly as is reasonably practical.

A vessel is defined as 'established' after six months' DP operations with the vessel's key DP personnel having the competence described in section 6, together with vessel experience as described in Table 1 below, particularly if the vessel is engaged in diving support, drilling or operations close to installations.

8.1 Recommended Minimum Experience on an Established DP Operational Vessel

KEY DP PERSONNEL	PREVIOUS DP VESSEL		SUBJECT DP VESSEL	
	HOURS	WEEKS	HOURS	WEEKS
<i>Master / OIM</i>	250	10	100	4
<i>Senior DPO</i>	250	10	150	2
<i>DPO</i>	150	3	50	1
<i>Chief Engineer</i>	250	10	100	4
<i>Senior Engineer Watchkeeper</i>	100	4	50	2
<i>Engineer Watchkeeper</i>	50	2	50	2
<i>Electrical or Electronics Tech</i>	250	10	100	4

Table 1

Table 1 gives the basis for an established vessel's key DP personnel's experience for any class 1, 2 or 3 DP vessel worldwide, even if a large change of personnel has taken place. There will be occasions when the requirements set out in Table 1 are not fulfilled, such as when personnel do not have the requisite previous experience in their rank or rating. In the six-month period for a vessel to become established the subject vessel experience should, however, be never less than that required for a new or unfamiliar vessel as set out below in 7.2.

Where personnel do not have the requisite previous experience in their rank or rating, a period of enhanced familiarisation for that person could be required. The procedure for such familiarisation would need to be flexible to cope with the vessel's specific operational requirements and the individual's existing knowledge and experience. The goal of such enhanced familiarisation would be to achieve a level of knowledge and skill equivalent to what would be gained by the experience listed in Table 1 (IMCA M 117 Rev. 2 at Page 18).

A new or unfamiliar vessel is a new or different vessel to some or all of its key DP personnel. Key DP personnel joining a new or unfamiliar vessel should undergo a structured familiarisation programme. An essential part of this is a supervised programme of onboard training followed by assessment.

A brand new or converted vessel has generally had owner's/operator's acceptance trials as well as commissioning and FMEA trials, all of which may provide an opportunity for key DP personnel to complete assessment tasks and become suitably experienced in less time than when the vessel enters service.

The minimum period of familiarisation that has been found to be satisfactory in the past is set out in Table 2 (IMCA M 117 Rev. 2 at Page 18).

The following assumes that, where possible, vessel experience is as per 8.1 and that instruction from manufacturers/suppliers is called onboard as appropriate during the following time periods.

8.2 Recommended Minimum Experience on a New or Unfamiliar Vessel

KEY DP PERSONAL	<i>Minimum Vessel Experience</i>	
<i>Master / OIM</i>	<i>50 Hours</i>	<i>over 7 days at sea</i>
<i>Senior DPO</i>	<i>50 Hours</i>	<i>over 7 days at sea</i>
<i>DPO</i>	<i>50 Hours</i>	<i>over 7 days at sea</i>
<i>Chief Engineer</i>	<i>21 days</i>	<i>including 7 at sea</i>
<i>Engineer Watchkeepers</i>	<i>14 days</i>	<i>including 7 at sea</i>
<i>Electrical or Electronic Tech</i>	<i>21 days</i>	<i>including 7 at sea</i>

Table 2

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. The maximum benefit will be half the required hours at a rate of two hours simulation to one hour of actual DP operation. This assumes that the actual DP operation consists of continuous active use of the DP control system and not just monitoring position keeping.

The days required for engineering staff assume that time is spent in port and on passage becoming familiar with the vessel's engineering systems and their control.

8.3 Minimum Period of Familiarisation on a Familiar Vessel

A familiar vessel is considered in these guidelines as one that has the same DP control system, or the same type of engines and switchboard configuration and is or has been engaged in similar operations.

If the equipment supplier is the same, this will not necessarily mean that the control system is 'familiar' because third and fourth generation DP control systems are likely to be quite different to operate, although the concept of operation may be the same. It can be helpful if vessel owners/operators indicate to clients those systems which are similar within their fleet.

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	
<i>Master /OIM</i>	<i>24 Hours DP</i>	<i>3 Days at sea</i>

Senior DPO	24 Hours DP	3 Days at sea
DPO	24 Hours DP	3 Days at sea
Chief Engineer	24 Hours DP	3 Days at sea
Engineer Watchkeeper	24 Hours DP	3 Days at sea
Electrical and Electronics Technician	24 Hours DP	3 Days at sea

Table 3-Recommended minimum period of familiarisation on a familiar vessel

(IMCA M 117 Rev. 2 at Page 19)

Please find below a link to current Deck and Engineering training regimes that apply in Australia that stipulate required skill sets that Institute members are required to meet:

[Current Training Packages D & E Maritime](#)

The timeframes in all of the tables 1, 2 & 3 above, belie the three plus years of experience for Chief and two years of experience for First Engineers that the company has sought in its proposed Labour Agreement. The three and two years of experience (as distinct from sea service requirements set out in Marine Order 72 issued by the Australian Maritime Safety Authority) is an artifice by DOF designed to preclude the employment of local Engineers in the Australian Exclusive Economic Zone.

We look forward to elaborating further in our consultations with the Department and put you on notice regarding Clause 12 Job Security of the DOF Management Australia Pty Ltd Engineers Maritime Offshore Oil and Gas Industry Enterprise Agreement 2016 reproduced below:

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.

We would be pleased to ascertain how DOF reconcile the above undertaking to employ local Engineers with your application for a Labour Agreement seeking as it does to enshrine the engagement of non-local Engineers by drastically and artificially elevated sea service intervals on DP tonnage.

Yours faithfully



Andrew Williamson
Assistant Federal secretary