

Dear Sir/Madam

RE: Emergency Services Levy Review Draft Report\_ - Feedback

I would like to make comment on the above report specifically the recovery of operating the Marine Sea Rescue Service via a proposed levy on boat registration fees.

First, I would like to comment on the wonderful job this organisation does and the service it performs is very well appreciated by the boating community – Marine Sea Rescue Service have saved many lives.

However, in recent years Sea Rescue has moved from an efficient streamlined volunteer based organisation widely supported by the community including fund raising. I can always remember the volunteers at the local shopping centre literally rattling the can to raise funds for the next boat. Today, in a few short years after the organisation was absorbed by FESA we see a bloated government run organisation that requires a levy to be maintained. No surprises really. One such example is where Fremantle Sea Rescue occupy prime real estate at the Cantonment Hill Signal Station where expense seems to be not a consideration. Well done on providing to the community, but if you want me to pay, you might have asked first.

As an avid boatie I do not wish to criticise these wonderful people that volunteer both their time and frequently put their lives at risk. However, as I watched the transition to FESA unfold, it was in the back of my mind who would pay for this lavish expenditure and the probable answer is now clear - the boating public.

I am not suggesting we wind back the service but given the government inability to manage expenditure, I am concerned about how far will this expenditure and ultimate expense recovery will go.

Increases of this magnitude are not sustainable but boating is see as a luxury expenditure with the often-taken view 'if you can afford a boat, you can afford to pay'

In 2011 boat registration fees increased dramatically (+27%). Since then fees have increased year on year significantly above CPI with 10% increases in 2014 & 2015. The increase in 2011 was justified on the back of substantial increases in public facilities made available to the boating public. The Minister at the time cited the number of new ramps and other facilities that had been provided by the Dept. of Transport. The Minister went onto say that the cost increase would be proportionate to the length of the vessel as larger boats use more facilities.

As a member of the boating public that sails out of Fremantle, I choose to pen my vessel in a private member sailing club. Due to the size of my vessel (13.1m registered

length) and weight 13 tonne fully loaded, I am restricted by draught (2.0m) to many of the bays and estuaries that consume Dept. of Transport funding i.e. Peel Inlet. Conversely due to the height of my mast I am unable to transition the traffic bridges at Fremantle and do not use any of the facilities on the Swan or Canning waterways. Likewise, I am unable to use any of the ramps due to my vessel's design and weight.

The statement by the Minister in 2011 that larger vessels use more facilities is absolute nonsense. In fact, I would strongly suggest large well fund boats are for the most part independent of Dept. of Transport infrastructure.

Most of my time on the water is offshore sailing, where a high degree of self-sufficiency is critical to the safety of all on board. Although we are a cruising yacht we carry and maintain all the safety equipment that would be found on a round the world racing yacht. In the event of an emergency we would more likely be contacting the Rescue Coordination Centre in Canberra, managed by the Australian Maritime Safety Authority.

In terms of Marine Sea Rescue the suggestion is that users pay and that the cost will be proportionate to vessel length. Again, an easy target where the ill found logic 'if you can afford a big boat, you can afford to run it' has been applied.

From the Fremantle Sea Rescue webpage, I note the statement that ***"Fremantle Sea Rescue is one of Australia's busiest Sea Rescue groups. In 2015 we responded to 712 calls for assistance"***

What his webpage doesn't state or provide is a breakdown of the data of the rescue such as type of vessel, the conditions in which the rescue occurred, the experience of the operator, years of experience etc.

Anecdotally my experience is many of the rescues are small open craft operating in open waters, often in poor weather that rapidly changed with a basic level of safety gear with many incidents due to equipment failure such as dead batteries, engines that won't start or water in fuel tanks or simply run out of fuel.

I am not sure if any in-depth study has been conducted to support the user pays argument in the proposed Emergency Service Levy. If this was in fact the case, members of the boating public that sail with sufficient experience and a well-found boat would most likely prove to have a very small demand on Marine Rescue services.

One source of data that is useful to compare my anecdotal experience is the ongoing published yearly data on recreational marine accidents statistics in the United States released by the US Coast Guard.

<http://uscgboating.org/library/accident-statistics/Recreational-Boating-Statistics-2016.pdf>

Although this document is limited to accident data, I would suggest there is a strong correlation between types of accidents and rescues by different sectors.

I strongly recommend that this document is considered and local data compared when any proposed levy, especially one that is linked to vessel length or type is considered.

On page 46, Summary Table 22 provides a high-level analysis of the operator information for all 5967 accidents that occurred in 2016. Previous years are available.

If I compare my situation a 61-year-old sailor, I find I am slightly above average in terms of my statistical risk of being involved in an accident on the water (1236 of all accidents or 20.7% by age across 8 categories). Most likely due to the fact we are less restricted by family or work to enjoy the water.

However, if I consider my experience (Over 500 Hours) my exposure is substantially reduced to 631 of all accidents or 11%.

Being a former professional mariner with over 160,000 sea miles logged, ~90% in a professional maritime capacity, with over 17,500 miles in sailing craft, my exposure based on my marine military qualifications using an assumed equivalent of (US Power Squadrons) my risk reduces to 59 of all accidents of less than 1%.

The last piece of data is type of vessel.

I sail an ocean-going yacht that is well founded. The statistics provided in the US only consider sailing boats as a generic category and don't differentiate between large ocean-going vessels and small dinghies.

Page 49, Table 25 ▪ provides PERCENT OF DEATHS BY VESSEL TYPE, 2004-2016. A review of 2016 sees some 68% of fatalities caused by operators of Canoe/kayak (22%) & Open motorboat (46%).

In fact, Sailboat (only) doesn't record any fatalities for this period.

Despite this information being US based, I would suggest in the absent of any collected local data, that this could form the basis of determining where user pays funding is based on.

In summary small, open craft operating in open ocean are significantly more likely to require marine rescue services than a well-founded offshore sailing vessel, yet the yacht will most likely pay a significant premium over other vessels. Small non-registered vessels such as kayaks, canoes and other craft in this category would not pay any levy despite being a high-risk category.

Imposing an Emergency Services Levy across all users discriminates against those that prepare well, use a suitable vessel with appropriate experience and training and regarding key warnings such as weather.

An analogy for charging owner of larger boats a significant premium over other users would be ambulance services charging a higher premium when attending people that own big houses. For the most part, there is little differentiation between assisting a small craft and a large vessel other than the large vessel is more likely to be able to assist in the rescue by better communication and other emergency aids.

One final point is sailing a yacht, my primary means of propulsion is wind via the sails on the vessel. If the auxiliary motor doesn't start, this is not necessarily a situation that creates an emergency and in any event, it would be highly likely that I would sail to the nearest port rather than have the sea rescue services come to me.

Perhaps I shouldn't have mentioned the wind in case this also is the subject of a future levy.

Although I submit this feedback as a concerned private citizen, I have listed the nautical based organisations I have been or still am a part of below.

**Terry Baker**

Past Commodore Fremantle Sailing Club

President – Submarines Association Australia

Chair of Governors, Leeuwin ocean Adventure Foundation