

12 November 2024

Australian Communications and Media Authority
Via web upload



133 Scarborough Beach Road
Mount Hawthorn WA 6016

T 08 6240 7700

scoutswa.com.au

ABN 59 653 914 921

Chief Scout:
His Excellency
The Honourable
Chris Dawson APM
Governor of Western Australia
President:
The Hon Kerry Sanderson AC CVO
Patron:
The Hon Dr Ken Michael AC

SUBMISSION IN REPONSE TO "PROPOSAL TO REMAKE 2 MARINE RADIO INSTRUMENTS"

The Scout Association of Australia, Western Australian Branch ('Scouts WA') provides this submission to the Australian Media and Communications Authority ('ACMA') Consultation on "*Radiocommunications (Certificates of Proficiency – Minimum Age) Declaration 2025*".

Introduction

Scouts WA submits that the appropriate minimum age for the issuance of a *Short Range Operator's Certificate of Proficiency* ("SROCP") is 12 years of age.

Scouts WA submits that 12 years is appropriate given:

1. The minimum age prescribed by Australian State and Territory governments for the issuance of a Recreational Skippers Tickets or a Marine/Boat Licences that are issued by all State Governments (except the Northern Territory);
2. Mandatory fitment requirements for VHF marine radios
3. There is no age limit for the Australian Waters Qualification

Background

Scouts WA operates a water activity program throughout Western Australia, focusing on power boating, sailing and paddle craft.

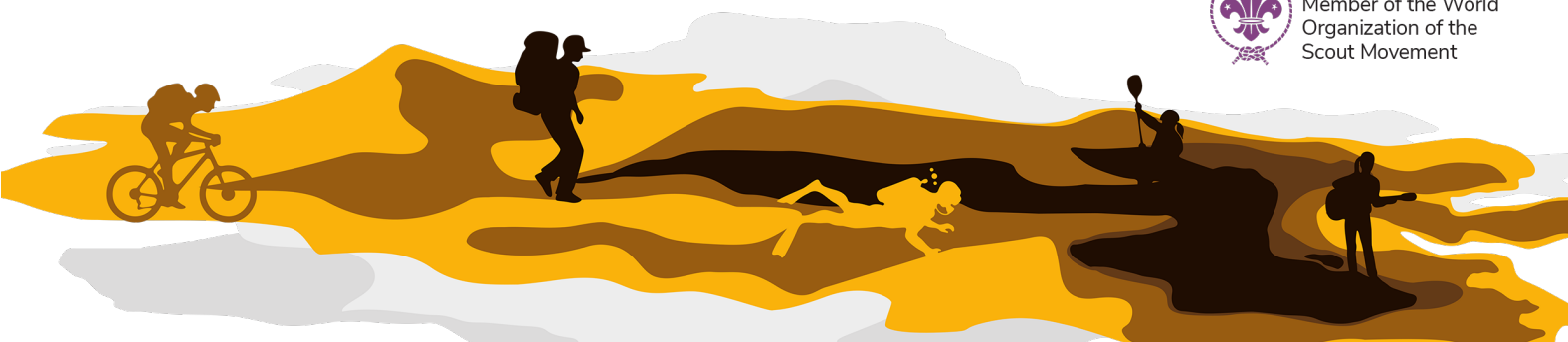
Scouts WA is a member of Scouts Australia (the national organisation for Scouts in Australia) and there are equivalent State Branches of Scouts Australia in all Australian States and Territories, who operate similar water activities programs.

There are many boating and yacht clubs across Australia that run similar youth focussed programs.

We contend that our submission is applicable to all young people in Australia involved in boating, sailing and paddle craft activities.



Scouts Australia
Member of the World
Organization of the
Scout Movement



Young people and boating

In all boating, sailing and paddling activities, radio communications are paramount to ensure participant safety.

Scouts WA's program involves young people aged 5 to 26 and is supported by trained and qualified adult leaders and trainers. As young people age and increase their skills, they can operate boats, sail craft and paddle craft together with other young people in the absence of adults.

Adults in support boats provide training, support, and rescue capabilities, and are part of activities as determined by a thorough risk assessment. Reliable communications between the participant (on a sail, power, or paddle craft) and the support boat provides safety, assurance, and training opportunities, and is a key risk reduction tool.

As these activities take place on water using boats and paddle craft, in rivers, lakes, and at sea, Marine Radio is the most appropriate form communications equipment, in addition to any mandatory fitment requirements under State or Commonwealth legislation.

Minimum Age to hold a Recreational Skippers Ticket (RST) or Boat Operator's Licence

In Western Australia, the minimum age to obtain a Recreational Skippers Ticket is 14 years. Persons as young as 10 years old may operate a recreational vessel with a motor up to 6hp (4.5kW). There is no minimum age to operate a sailing boat without an engine.

Scouts WA routinely has competent young people from under 12 years of age in charge of a sailing boat. Scouts WA routinely has competent young people under 16 years of age in charge of a sailing boat with a 6hp 'backup' motor installed.

By allowing persons from 12 years of age and older to obtain a SROCP there is a significant opportunity to:

1. increase compliance with the requirements to have a trained radio operator on board;
2. increase training and awareness in correct radio distress and routine communications procedures; and
3. develop a safer boating environment for all persons involved.

We note that other State Transport jurisdictions have similar age requirements for operating a powered boat (by holding a Recreational Skippers Ticket or Boat Licence), including:

- Victoria – 12 Years
- South Australia – 16 Years (provisional licence 12 – 16 years)
- Queensland – 16 years
- Tasmania – 18 years (Provisional licence 12-17 years)

- Northern Territory – No licence / ticket required
- New South Wales – 12 Years

It is reasonable, and legal in most states, to expect a 12 to 14 year old to be able to demonstrate a capability, and be qualified, to operate a boat. It is therefore appropriate for them to also be able to hold a SROCP, to enable them to legally and safely operate VHF marine radio equipment.

Mandatory Fitment Requirements

Victoria's state transport regulator requires all boats travelling in non-protected waters to be fitted with VHF marine radio equipment. Western Australia has mandated the same requirement effective from 1 September 2028.

Compliance with these State requirements may potentially leave young boat operators non-compliant with either State and/or Commonwealth legislative requirements, if they were operating offshore with 27MHz radio (which they could legally use without a qualification), or operating a VHF radio without an appropriate marine radio qualification.

Lowering the minimum age of the SROCP to 12 years would remove this compliance gap between State Government mandatory radio fitment and boat licencing requirements, and Commonwealth Radio Operator qualification requirements.

Lowering the age will also encourage younger Recreational Skippers Ticket /Boat Licence holders to receive proper and appropriate training, become more competent in the operation of marine radios, and improve the safety of their own self, their crew, and other nearby boat operators.

Many people choose to install a marine radio, even if they never intend to operate their boat in a mandatory fitment environment. As VHF is a mandatory fitment requirement offshore in Victoria and WA, most boat operators are likely to choose a VHF marine radio, and this is a selling point for retailers. There is a bigger range of VHF marine radio equipment on the market (compared to 27 MHz), including popular VHF marine handheld radios. Features such as Digital Selective Calling (DSC) improve safety and are not available on 27 MHz equipment. An SROCP or similar qualification is required to obtain a Maritime Mobile Service Identity (MMSI) number for DSC use.

For these reasons, it would be likely that, over time, most of the marine radio equipment in the recreational space will become VHF only.

It is also noted that there is no requirement to show evidence of qualification when purchasing a VHF Marine radio, thus it is reasonable to assume there is a cohort of boat owners with a VHF radio and without a qualification.

This 'choice' in consumer demand pushes an increase in the number of VHF Marine radios in use, and a decrease in the number of 27 MHz Marine radios being purchased and in use.

This in turn leads to those aged under 16 being forced by Commonwealth requirements to use 27 MHz which, based on the above, is an inferior, less densely used system. This increases the risk that young boat operators might be unable to get timely assistance in a distress situation.

We contend that lowering the age for the issuance of a SROCP will improve boat safety for 12 to 16 year olds specifically, and the larger boating community more generally.

SROCP vs AWQ

The Australian Waters Qualification ("AWQ") has no prescribed lower age limit, covers similar content, and can be studied in lieu of the SROCP.

The AWQ requires an organisation wishing to deliver Marine Operator training (such as the SROCP) to work with a Registered Training Organisation (RTO) to meet certain standards and trainer qualifications, to deliver the course. These requirements are often suited to more detailed courses, and to larger organisations with time, resources, and employees to do so.

The SROCP is more easily assessed by individual invigilators accredited by the Australian Maritime College (AMC), and thus more accessible to individual boat operators in the recreational space.

Having either qualification available to Recreational Skippers Ticket holders means more opportunity for young people to become qualified in Marine Radio Operation, and therefore collectively improve the safety of all persons at sea.

We contend that it should be up to the applicant, irrespective of their age, to choose the method of qualification and training route most suitable for their needs.

Given that the ACMA recognise both the SROCP and the AWQ as being equivalent for the purposes of operating VHF Marine Radio equipment, we contend that the age range of the applicant for each qualification should be similar.

Conclusion

Scouts WA urges the ACMA to amend the minimum age of for the issuance of a SROCP to 12 years:

1. To harmonise the SROCP with the minimum age prescribed by Australian State and Territory governments for the issuance of Recreational Skippers Tickets or a Marine/Boat Licences that are issued by all State Governments (except the Northern Territory);
2. To ensure young people remain compliant with mandatory fitment requirements for VHF marine radios in Western Australia and Victoria;
3. As there is no age limit for the Australian Waters Qualification, which is, for all practical purposes, an equivalent qualification.

For further information regarding this submission please contact the Branch Leader Radio and Technology by email bl.radiotechnology@scoutswa.com.au