Offshore Petroleum and Greenhouse Gas Storage Legislation Amendment (Safety and Other Measures) Bill 2024

Submission from the Maritime Union of Australia

7 March 2024

Senate Economics Legislation Committee

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Introduction

This submission has been prepared by Maritime Union of Australia (MUA).

The MUA is a division of the 120,000-member Construction, Forestry, Maritime Employees Union and an affiliate of the 20-million-member International Transport Workers' Federation (ITF).

The MUA represents approximately 14,000 workers in the stevedoring, shipping, offshore oil and gas, port services and commercial diving sectors of the Australian maritime industry.

Contents

Recommendations

We urge the Committee to make the recommendations to Government listed below.

Recommendation 1: To implement the ACTU's recommendations to make amendments to the Bill to properly align it with rights under the Model WHS Act in the areas of:

- Employer costs relating to HSRs attending HSR training and refresher courses
- The right to request a review of safety related management documents
- HSR elections and Designated Work Groups
- Psychosocial hazards
- Discriminatory conduct and prohibited reasons to include conduct occurs outside the employment relationship, and the protection of workers who raise issues with their union in relation to health and safety matters.

Recommendation 2: Support further steps to achieve full harmonisation of the work health and safety provisions of the OPGGS Act with the national WHS system, particularly with regards to the rights of workers and Health and Safety Representatives to participate in safety management and raise safety issues, with support from their union, and requirements for high-risk work licences.

Recommendation 3: For Australia to apply the *Navigation Act 2012* (and the International Maritime Organisation (IMO) safety standards it implements domestically) to Australian vessels that are attached to the seafloor as offshore facilities, in line with other global maritime administrations. This could be achieved by amending Schedule 2 Part 1 of the Bill to delete s.640 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGS Act).

Recommendation 4: To amend Schedule 2 Part 1 of the Bill so that the proposed new s.342A of the Navigation Act requires the application of:

- The IMO Standards for the Training and Certification of Watchkeepers Convention, and the IMO Resolution A.1079(28) Recommendations for the Training and Certification of Personnel on Mobile Offshore Units (MOUs) to offshore units.
- The ILO Maritime Labour Convention and associated MO11: Living and working conditions to offshore units.
- Other IMO conventions as specified by AMSA, for example the Safety of Life at Sea Convention (SOLAS).

Recommendation 5: To amend Schedule 2 Part 1 of the Bill to delete the proposed s. 342 (7) of the *Navigation Act*, which says that maritime safety measures can only be implemented on vessels that are attached to the seafloor as offshore facilities with the agreement of the Chief Executive Officer of the National Offshore Petroleum Safety and Management Authority**.** This measure invites efforts by companies to seek to block the implementation of aspects of the maritime safety legislation they would prefer not to comply with.

Recommendation 6: Ensure that any new Rules developed under the proposed new s.342A are underpinned with the full suite of Navigation Act Regulations, compliance and enforcement mechanisms. AMSA must have access to the full suite of measures to enforce rules created under s342A, including funding and vessel access for Inspectors.

Recommendation 7: Require a consultation process involving unions representing the affected workforce for any new Rules developed under the proposed new s.342A of the Navigation Act.

Recommendation 8: That the government delay consideration of amendments to the *Environment Protection and Biodiversity Conservation Act 1999* that allow amendments to the OPPG Environment Regulations (Schedule 2 Part 2 of the Bill) until after the government has a clear proposal on how it wishes to amend these Regulations.

Recommendation 9: That the Government find ways to bring together ocean environment expertise and staffing for *Environment Protection and Biodiversity Conservation Act 1999* assessments of offshore renewable energy and offshore oil and gas to make the process more efficient and ensure that renewable energy projects can be constructed in time to effectively address the climate crisis while minimising environmental impacts.

Recommendation 10: That a union's status as 'relevant persons' whose 'functions, interests or activities' may be affected, be protected in any reform of consultation processes in the OPGG Environment Regulations. Genuine consultation with unions, in the course of preparing for offshore petroleum activities, will assist both proponents and workers in meeting Australia's labour demand.

Recommendation 11: Any reform of consultation processes in the OPGG Environment Regulations must preserve First Nations rights to comprehensive and authentic consultation about projects on their lands and waters.

Harmonise Work Health and Safety

Workers in the offshore petroleum industry are denied some of the basic work health and safety rights and protections enjoyed by other Australian workers, contrary to the fundamental principle of uniformity in work health and safety regulation in Australia. Full harmonisation between the OPGGS Act and the Australian WHS system must be undertaken.

The critical area in which the OPGGS Act safety provisions fall short of the national WHS system is rights for workers and Health and Safety Representatives to cease unsafe work, and the general rights, training, support and protections provided to workers and Health and Safety Representatives to participate in safety management and raise safety issues. Genuine tripartism and the ability for workers and HSRs to access support from their union is also needed. The lack of these rights offshore contributes to an atmosphere in the industry where workers feel they are unable speak up on safety without risking their employment.

The reforms in this Bill are a step forward. However, in several areas the Bill proposes amendments that fall short of full harmonisation with the rights of workers onshore. We support the ACTU's submission and share the view of the ACTU that where are amendments are made they should be in alignment with the Model WHS Act. This includes important areas such as:

- Employer costs relating to HSRs attending HSR training and refresher courses
- The right to request a review of safety related management documents
- HSR elections and Designated Work Groups
- Psychosocial hazards
- Discriminatory conduct and prohibited reasons to include:
    - Conduct that occurs outside the employment relationship, and
    - the protection of workers who raise issues with their union in relation to health and safety matters.

Further details are available in the ACTU's submission.

A number of offshore oil and gas projects are currently under construction. This is high-pressure work where the highest level of safety protection is required for workers. Unfortunately these projects have been dogged with safety concerns and incidents that continue to escalate. There is also an increasing quantity of work decommissioning disused oil and gas facilities. Both construction and decommissioning are particularly high-risk work, and workers must feel secure in speaking up for safety at each step.

In other Australian work health and safety jurisdictions, the operation of specific high-risk work is governed by a system of certification or licensing designed to minimize the risk of adverse consequences associated with a lack of competency. These licences cover key competencies that are particularly important for construction and decommissioning, such as rigging, dogging and crane work. Workers must complete a VET course to obtain the requisite licence.

The 'permit to work' system in the OPGGS Regulations is far less rigorous. It does not require certification or licensing, merely requiring that the 'safety case for a facility must provide for the operator of the facility to establish and maintain a documented system of coordinating and controlling the safe performance of all work activities of members of the workforce at the facility'.

In our view the lack of these offshore licences contributed to the death of Michael Jurman on 2 June 2023 while performing rope access maintenance work on the North Rankin platform.[14]

Given the additional layers of risk in the offshore petroleum industry (a major hazard industry where work is performed in remote locations), there is even greater reason to ensure that those persons performing high risk work are properly trained and qualified.

Apply Navigation Act maritime safety standards to all vessels

Schedule 2 Part 1 of the Bill addresses the maritime safety requirements that apply to vessels that are attached to the seafloor facilities as floating facilities. The Maritime Union of Australia represents workers on these vessels, mainly maritime crew. As part of the Offshore Alliance we now jointly represent non-maritime crew on many FPSOs. Our members are directly impacted by changes to safety requirements on these vessels.

In 2003, the Australian government removed the requirement for *Navigation Act 1912* maritime safety standards to apply to vessels while they are connected to the seafloor. In the industry this is referred to as the 'disapplication' of maritime safety legislation.

It is widely understood in industry that the disapplication of the Navigation Act was supported by oil and gas companies who wished to remove maritime crew from these floating facilities, because they were more likely to be union members. The government-commissioned Bills and Agostini report of 2009 made an extensive search of all government documentation around the introduction of the disapplication measure in 2003, and were unable to find any clear rationale for it.[1] This outdated prejudice has no place in our current society, and has no justifiable basis in offshore safety regulation and legislation.

The disapplication created confusion, undermined continuity in the safe management and maintenance of FPSOs, and is wholly unnecessary. As far as we are aware, Australia is the only country that disapplies maritime safety provisions from vessels that are also offshore facilities.

MUA member Trevor Moore was killed during the emergency disconnection of the FPSO *Karratha Spirit* during a cyclone in 2008. MUA members on board report that even in the thick of the accident, management were arguing about safety jurisdiction. The Australian Transport Safety Bureau report identified the jurisdictional confusion as a 'significant safety issue' for both the OPGGS and the Navigation Act safety regime.[2] The 2009 government-commissioned Bills and Agostini report recommended that legislation be amended to ensure continuity of maritime standards and AMSA's role in providing assurance.[3] However, under industry pressure, this never happened.

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[1] Kym Bills and David Agostini, 2009, *Offshore Petroleum Safety Regulation: Marine Issues*, Department of Resources and Energy, Recommendation 3, p.18-21

[2] Australian Transport Safety Bureau, 2010, *Independent investigation into the fatality on board the Australian registered floating storage and offloading tanker* Karratha Spirit *off Dampier, Western Australia on 24 December 2008*, p. 47-8.

[3] Kym Bills and David Agostini, 2009, *Offshore Petroleum Safety Regulation: Marine Issues*, Department of Resources and Energy, Recommendation 3, p.24.

The disapplication of maritime safety standards contributed to the *Northern Endeavour* debacle and the burden this has placed on the Australian government and public.[4] The *Northern Endeavour* was only four years old when maritime safety standards were disapplied from the vessel, and it subsequently degenerated into a rust-bucket. AMSA said that:

> if we had a regime in place where AMSA inspectors could access the structure, it would have resulted in a regulatory regime that would have prevented the deterioration of the *Northern Endeavour* to the point that it became a safety and environmental hazard.[5]

We are also concerned that that FPSO *Montara Venture* is also in very poor condition, as evidenced by multiple Directions, Prohibition Notices and Improvement Notices on NOPSEMA's website. This FPSO is 34 years old, and has been exempt from maritime safety regulation for approximately 20 years.

While the proposal in Schedule 2 Part 1 of the Bill does allow the Australian Maritime Safety Authority to re-apply some, unspecified, maritime safety rules, we are concerned that the process for deciding what will be applied is entirely opaque and will create considerable uncertainty, particularly for the maritime crew qualifications for these facilities.

We are concerned that the proposed structure in the Bill creates an invitation for the offshore oil and gas industry to continue to apply its considerable political power to the government and agencies to keep maritime-qualified crew off vessels that are also offshore facilities.

We urge the government to reconsider the position put forward in this Bill and to allow the *Navigation Act* (and the International Maritime Organisation (IMO) safety standards it implements domestically) to properly apply to Australian-flag vessels while they are connected to the seafloor as offshore facilities.

Recommendation 3: For Australia to apply the *Navigation Act 2012* (and the International Maritime Organisation (IMO) safety standards it implements domestically) to Australian vessels that are attached to the seafloor as offshore facilities, in line with other global maritime administrations. This could be achieved by amending Schedule 2 Part 1 of the Bill to delete s.640 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGS Act).

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[4] A good summary of what went wrong on the *Northern Endeavour* is in Peter Milne, Federal Govt regulates poorly and gets $360M Northern Endeavor clean-up bill, Boiling Cold, 2 Oct 2020, with a further update here: Peter Milne, Offshore oil & gas producers to pay for $1B Northern Endeavour cleanup, Boiling Cold, 11 May 2021. The government-commissioned report that recommended improvements to legislation, Steve Walker, Review of the Circumstances that Led to the Administration of the Northern Oil and Gas Australia (NOGA) Group of Companies, Commonwealth of Australia, June 2020.

[5] AMSA, letter to Offshore Resources Branch, Offshore Oil and Gas Safety Review: draft policy framework, 9 November 2020, p.2. Included as a part of the AMSA written response to Question on Notice no.61 in the Additional Estimates of the Senate Rural and Regional Affairs and Transport Committee, question from Senator Rex Patrick.

The need for consistency

The IMO standards incorporated into the Navigation Act continue to apply to international flag floating facilities in Australian waters, even while Australian-flag facilities are exempt. For example, the Panamanian flag FPSO *Ningaloo Vision* has a full suite of maritime-qualified crew on board and must maintain compliance with IMO maritime safety standards while they are connected. Our understanding is that this is because the maritime regulator in Panama has not disapplied the IMO standards, like Australia has. This is best practice, and demonstrates that it is perfectly feasible to have the IMO international maritime safety systems apply concurrently to the OPGGS Act safety regime.

The government has argued that concurrent application of the Navigation Act and the OPGGS Act creates confusion. We reject this assertion. Concurrent application of maritime safety and WHS legislation is the norm in all other parts of the Australian maritime industry. In these cases, the Australian Maritime Safety Authority coordinates responsibilities with the relevant safety regulator, as they have different areas of responsibility, typically through the use of Memorandums of Understanding between the different regulators. For example, in ports and in state waters, state WHS Acts apply to process safety on board vessels, at the same time as the Navigation Act maritime safety standards apply on larger ships. On smaller Domestic Commercial Vessels, the *Marine Safety (Domestic Commercial Vessel) National Law Act 2012* applies at the same time as the state WHS Act.

Problems with the current proposal

The proposed new section 342A in the Bill allows:

- For vessels that become offshore facilities, AMSA can make a rule/legislative instrument about a vessel, person or activity that continues the application of the *Navigation Act*, with or without modification.
- Such rules will override the 'disapplication' of s.640 or 641 of the OPPGGS Act.
- Any rules that AMSA makes are subject to the agreement of the CEO of NOPSEMA.

Our primary concern is that the proposal in the OPGGS Amendment Bill 2024 does not require maritime qualified crew on FPSOs to ensure they are maintained to maritime standards and prepared for safe disconnection and navigation, particularly during storms.

We are also concerned that the Government (and the oil and gas industry) is mainly focussed on enabling 'AMSA to issue safety and pollution certificates under the Navigation Act to facilities' (Explanatory Memorandum, para. 293). However, AMSA should only be able to issue such safety and pollution certificates if they are underpinned with the full suite of Navigation Act Regulations, compliance and enforcement mechanisms. This is not a paperwork problem – it is a maritime safety and training problem, as evidenced by the atrocious condition of the *Northern Endeavour* after spending most of its working life being exempted from this maritime safety regime.

The Explanatory Memorandum to the Bill says that 'Rules made under section 342A will be subject to scrutiny through the rule-making process, which includes parliamentary tabling, scrutiny, and disallowance processes.' However there is no consistent and transparent process or consultation specified to determine what aspects of maritime safety rules will be adopted (and what will not). There was no satisfactory consultation process leading up to the proposal contained in this Bill. The

first clear written explanation we were offered by Government was when this Bill was introduced to Parliament, despite our clear correspondence with the Minister about this issue in January 2023.

The Explanatory Memorandum says that the proposed structure is required because:

> The legislative framework that applies Australia's commitments as a member of the IMO is highly complex and prescriptive in the requirements that apply to particular types of vessels and aspects of safety and pollution management. The construct of marine orders (which are rules made under the Navigation Act) provides AMSA with an appropriate level of flexibility to rapidly implement changes to IMO requirements.

While it is true that IMO requirements are prescriptive and change from time to time, such changes are generally at a glacial pace to facilitate compliance by the entire global shipping fleet. Australia plays a leading role in the IMO as a member of the IMO Council and should certainly be in a position to keep up with these changes.

At a minimum, the Bill should specify that the following IMO Conventions and associated Marine Orders should apply:

- The application of the STCW Convention and Marine order 47—Offshore industry units and MO21: Safety and emergency arrangements (Minimum Safe Manning Documents)
- The ILO MLC and associated MO11: Living and working conditions on vessels.
- Other IMO conventions as specified by AMSA, for example the Safety of Life at Sea Convention (SOLAS).

Listing the international conventions that should be complied with provides clarity for industry and the community, while also providing flexibility going forward on how this is implemented in Australian legislation.

Approval of the NOPSEMA CEO should not be required for maritime safety requirements. Maritime safety is not NOPSEMA's area of expertise. It is perfectly normal in other industries for other pieces of legislation to apply from other government departments – for example, industry-specific agencies are not given a choice about whether the WHS Act or the Fair Work Act applies to their specific industries.

All other Australian vessels must comply with both a maritime safety regime (under the *Navigation Act* or *Marine Safety (Domestic Commercial Vessel) National Law Act*) AND the WHS Act. We cannot see why the oil and gas industry should continue to receive this special treatment to prevent external scrutiny, particularly when this has led to such poor outcomes for the Australian government, public and the environment in the case of the *Northern Endeavour*.

Recommendation 4: To amend Schedule 2 Part 1 of the Bill so that the proposed new s.342A of the Navigation Act requires the application of:

- The IMO Standards for the Training and Certification of Watchkeepers Convention, and the IMO Resolution A.1079(28) Recommendations for the Training and Certification of Personnel on Mobile Offshore Units (MOUs) to offshore units.
- The ILO Maritime Labour Convention and associated MO11: Living and working conditions to offshore units.

- Other IMO conventions as specified by AMSA, for example the Safety of Life at Sea Convention (SOLAS).

Recommendation 5: To amend Schedule 2 Part 1 of the Bill to delete the proposed s. 342 (7) of the *Navigation Act*, which says that maritime safety measures can only be implemented on vessels that are attached to the seafloor as offshore facilities with the agreement of the Chief Executive Officer of the National Offshore Petroleum Safety and Management Authority**.** This measure invites efforts by companies to seek to block the implementation of aspects of the maritime safety legislation they would prefer not to comply with.

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Recommendation 7: Require a consultation process involving unions representing the affected workforce for any new Rules developed under the proposed new s.342A of the Navigation Act.

Environmental approvals process

The Bill proposes amendments to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) which would have the effect of entrenching NOPSEMA's current accreditation to carry EPBC Act approvals in law (in Schedule 2 Part 2). The Government has said that this amendment is necessary in order to amend the consultation requirements laid out in the OPGG Environment Regulations. There are two problems with this from our perspective.

1. The 2014 accreditation of NOPSEMA to perform EPBC Act approvals has drained the ocean environment expertise and staffing out of the Department of Environment, where it is now sorely needed to perform EPBC Act approvals for offshore renewable energy infrastructure. Government should be finding a way to bring these two areas of ocean environment expertise and staffing together to make the process more efficient, not permanently splitting them apart. It is critical that we are able to find ways to quickly construct large scale renewable energy projects to address the climate crisis, while minimising local environmental impacts.

2. The consultation on potential changes to the OPGG Environment Regulations is only beginning, so it is impossible for stakeholders to assess what the proposed changes to these regulations are. It would be much easier for stakeholders to understand the implications of this proposal once the proposed amendments to the Environment Regulations were understood.

Therefore, we suggest that the government delay consideration of the amendments to the EPBC Act (Schedule 2 Part 2 of the Bill) after the government has a clear proposal on how it wishes to amend the OPGG Regulations to clarify consultation requirements for offshore oil and gas projects.

We note that NOPSEMA is an industry-funded agency within the Department of Resources. Oversight and accountability to the Department of Environment provides an appropriate check and balance within government. Other industries are required to comply with multiple pieces of legislation, for example offshore renewable energy developers are required to apply for licences under both the Offshore Electricity Infrastructure Act and the EPBC Act. No justification has been provided about why the oil and gas industry requires special treatment in this area.

Recommendation 8: That the government delay consideration of amendments to the *Environment Protection and Biodiversity Conservation Act 1999* that allow amendments to the OPPG Environment Regulations (Schedule 2 Part 2 of the Bill) until after the government has a clear proposal on how it wishes to amend these Regulations.

Recommendation 9: That the Government find ways to bring together ocean environment expertise and staffing for *Environment Protection and Biodiversity Conservation Act 1999* assessments of offshore renewable energy and offshore oil and gas to make the process more efficient and ensure that renewable energy projects can be constructed in time to effectively address the climate crisis while minimising environmental impacts.

Consultation processes

We note with concern that some within industry are pushing for regulatory or legislative change to reduce consultation requirements that arose from the Federal Court decision *Santos NA Barossa Pty Ltd v Tipakalippa [2022] FCAFC 193*. Our union, and stakeholders more broadly, have benefited from these changes, with more companies consulting us about their decommissioning plans. Any watering down of this requirement will weaken the outcomes of consultation. That is to assist the titleholder to understand the complete spectrum of impacted values from their activities – environmental, cultural and social.

Reflecting upon the significance of 'free, prior and informed consent' to Indigenous people's self-determination, it is clear that much work remains to be done in providing genuine consultation. With project approval rightly pending authentic consultation, companies are not getting it right as seen by Woodside's conditional approval of a recent Environment plan – pending further consultation with First Nations. Undue pressure on community groups and land councils to 'hurry up and consult' is not the solution. We would prefer to see First Nations organisations provided the resources to ensure they can properly participate in consultations according to their individual customs and law.

We note DISR is currently carrying out a consultation on *Clarifying consultation requirements for offshore petroleum and greenhouse gas storage regulatory approvals***.** For more detail please refer to the MUA's submission to that consultation.

Recommendation 10: That a union's status as 'relevant persons' whose 'functions, interests or activities' may be affected, be protected in any reform of consultation processes in the OPGG Environment Regulations. Genuine consultation with unions, in the course of preparing for

offshore petroleum activities, will assist both proponents and workers in meeting Australia's labour demand.

Recommendation 11: Any reform of consultation processes in the OPGG Environment Regulations must preserve First Nations rights to comprehensive and authentic consultation about projects on their lands and waters.

Appendix A: Resolutions passed at Maritime Union of Australia National Conference, March 2024

STAKEHOLDER CONSULTATION

Offshore oil and gas activity requires offshore titleholders and applicants to understand the complete spectrum of impacted values from their operations – environmental, cultural and social.

Prior to recent successful appeals by First Nations groups, stakeholder consultation was virtually non-existent. The 2022 Santos versus Tipakilippa appeal ruling sent a clear message to industry and the regulator how the legislation is to be interpreted, resulting in new guidance from NOPSEMA. Authentic consultation on applications is now required to be undertaken as intended.

We note that our union has benefited from Tipakilippa decision through a wider definition of who is a 'relevant person' to be consulted and stronger consultation requirements. This has assisted our members by helping the union to identify, demand and create more decommissioning work.

Industry is reeling from the prospect of actually doing the required work to consult relevant persons, such as unions and First Nations people, intensely pitching the issue as a 'broken framework' and inferring Traditional Owner's heritage claims are unfounded or fraudulent.

The MUA trusts our workers and the First Peoples before any company and will not be led into fighting each other.

Any watering down of the consultation requirement will weaken its very purpose and diminish MUA workforce outcomes. With the Department of Industry Science and Resources currently seeking input on clarifying consultation requirements, it is critical that the MUA stands in solidarity with First Nations people as they seek to protect culture and Country for all Australians.

We note that should the consultation requirements be watered down for other stakeholders, this will diminish our members' rights too.

In keeping with the principles of procedural fairness that the MUA champions, the National Conference resolves that the union will:

- Protect our right to comprehensive and authentic stakeholder consultation.
- Stand with First Nations peoples to protect their rights to comprehensive and authentic stakeholder consultation.
- Acknowledge that all stakeholders have the right to appeal decisions by government agencies to protect workers' rights, the environment and to negotiate outcomes that contribute to closing the gap for First Nations people.

OFFSHORE SAFETY

All workers deserve to come home from work safely. We know this is best achieved in a work health and safety system where workers have a strong voice in how work is carried out, are employed on a permanent basis, and have the support of a strong union so they can speak up without fear of losing their job. On ships, global minimum maritime safety standards and maritime qualifications backed up by rigorous inspections apply alongside work health and safety standards.

Unfortunately oil and gas companies have influenced the Australian government to remove aspects of our national Work Health and Safety framework and maritime safety qualifications and standards from offshore oil and gas facilities. The Offshore Petroleum and Greenhouse Gas Storage Act is does not include many workers' safety rights. The Navigation Act and International Maritime Organisation (IMO) qualifications and standards have been disapplied from Floating Production Storage and Offloading (FPSO) facilities while they are connected to the seafloor.

National Conference notes that:

- The current Australian government has indicated it will make improvements to workers' safety rights under the OPGGS Act and to the application of *Navigation Act* qualifications and standards. However the government continues to maintain that only NOPSEMA can inspect and regulate offshore facilities that can also be ships, and that the *Navigation Act* cannot apply to them in full.
- It is normal for all other vessels in Australia to have concurrent application of maritime safety and WHS regulation, regulated by both AMSA and state safety regulators.
- IMO qualifications and standards are maintained on all international-flag FPSOs operating in Australian waters (eg. the *Ningaloo Vision*) at the same time as the safety of oil and gas processes are regulated by NOPSEMA.

National Conference calls for:

- The full harmonisation of offshore safety with national WHS provisions, including rights for workers to get support from a union official in their workplace, a mechanism for ongoing harmonisation as national WHS laws are review updated, and responsibility for WHS matters to be transferred to the same Minister who deals with WHS across other industries.
- The full application of the Navigation Act and IMO-aligned qualifications and standards to oil and gas facilities that can disconnect from the seafloor to operate as ships. AMSA should be able to carry out vessel inspections and regulate maritime aspects of vessel safety.