



SES Volunteers Association of WA (Inc) Position Paper: Flood Boat Compliance

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1. Executive Summary

The SES Volunteers Association of Western Australia (SESVA) has developed this position paper to provide feedback on proposed changes to flood rescue boat (FRB) operator training and certification requirements arising from Australian Maritime Safety Authority (AMSA) regulatory changes.

Flood boat rescue is a specialist capability conducted by 16 of WA's 64 SES units and relies heavily on skilled volunteers. While SES flood boat operators currently undertake extensive training, competency maintenance, and operational currency requirements, recent changes to the National Law governing domestic commercial vessels have introduced additional qualification and compliance obligations.

SESVA understands that AMSA now requires flood boat operators to hold qualifications including First Aid, a Short-Range Operator Certificate of Proficiency, and training equivalent to the Coxswain Grade 2 Near Coastal qualification. Additional requirements apply to trainer and assessor accreditation, and volunteers may be required to demonstrate substantial operational experience over a five-year period to maintain competency.

Although Exemption 24 currently allows eligible volunteer emergency service organisations to operate with trained volunteers rather than fully certified commercial coxswains until 30 June 2030, significant uncertainty remains regarding the practical implications of the exemption, future compliance requirements, liability exposure, and the transition pathway for SES volunteers.

Consultation undertaken by SESVA with representatives from 12 of the 16 SES flood boat units identified widespread concern regarding:

- Insufficient communication and guidance from DFES regarding implementation requirements.
- Uncertainty surrounding legal responsibilities and liability for volunteers.
- The significant training, accreditation and competency maintenance burden being placed on volunteers.
- The potential impact on volunteer recruitment, retention and operational readiness.
- The financial costs associated with additional qualifications, medical assessments and travel requirements.
- The suitability and contextualisation of nationally recognised maritime qualifications for SES flood rescue operations.



- The capacity of SES trainers, assessors and District Officers to meet new accreditation standards.
- The long-term sustainability of flood boat rescue capability in regional and metropolitan Western Australia.

SES units have consistently expressed that they currently lack sufficient information to form an informed position on the proposed changes. There is strong support for a collaborative and staged approach that minimises impacts on operational capability while ensuring compliance with regulatory requirements.

SESVA's preliminary position is that any mandatory compliance costs, training fees, medical assessments and associated expenses should be fully funded by DFES and not borne by volunteers. SESVA also considers it essential that DFES urgently engage with AMSA, the Department of Transport, local governments, Volunteer Marine Rescue and other stakeholders to provide clear written guidance on compliance obligations, implementation timelines and operational arrangements.

Without timely clarification and practical support measures, SES units have indicated that flood boat operations may become increasingly difficult to sustain and, in some circumstances, may be forced to cease due to unresolved legal, safety, training and resourcing concerns.

SESVA therefore seeks urgent consultation, transparent communication, and a practical implementation strategy that preserves the State's critical flood-rescue capability while ensuring volunteer safety, compliance, and long-term sustainability.



2. PURPOSE

The purpose of this position paper is to provide feedback from SES volunteer flood boat operators in response to the Department of Fire and Emergency Services (DFES) on the new training and certification requirements for SES flood boat operators.

3. BACKGROUND

3.1 Flood boat rescue operations (excluding Swiftwater rescue) are a specialist function undertaken by 16 of WA's 64 State Emergency Service units (Appendix 1). Currently, SES volunteers must first obtain a range of practical skills, theory qualifications and maintain annual currency of skills and qualifications.

3.2 From October 2023, enabling legislation¹ established a framework (National Law) to ensure the safe design, construction, equipping, crewing and operation of domestic commercial vessels (DCV) operating in WA waters and regulated by the Australian Maritime Safety Authority (AMSA).

Because of the National Law, the standard state-based training required of SES volunteer flood boat operators has changed. AMSA now requires persons in control of any DCV to hold advanced training qualifications.

The SESVA is advised by DFES that the current training of SES flood boat operators (coxswains) does not fully comply with AMSA's requirements. This means that SES flood boat operators now require significant changes to training hours, competencies and certifications.

3.3 To consider relevant risks and required actions for SES flood boat profile units, the SESVA hosted an urgent online meeting on 30 April 2026. This meeting provided an opportunity for the SESVA to support units to understand the issues and to better enable the SESVA to advocate for units with flood boats. 12 of the 16 units were represented at the meeting.

3.4 On 26 May 2026, DFES issued operational Circular 38/2026 Australian Maritime Safety Authority Exemption 24 Changes to Training. On 27 May 2026, DFES posted a webpage titled AMSA Exemption 24 on its website, explaining that changes to AMSA requirements came into force on 1 July 2025, as well as other general requirements for DFES and volunteers. That webpage is intended to keep volunteers informed of the review progress, changes and actions required, and the anticipated timeline to implement the changes required because of the updates to Exemption 24.

4. Limitations

The current composition of the SESVA executive and representatives has varying levels of knowledge of specialist flood boat operations and the regulatory framework. Based on the meeting discussion, SES units are unaware of any official advice that changes

¹ Marine Safety (Domestic Commercial Vessel National Law Application) Act 2023 (WA).



are required to be implemented on 1 July 2026. The current AMSA training requirements are at Appendix 2.

5. New AMSA training and compliance requirements

5.1 Operator Training Requirements

SESVA is informed that from 1 July 2025, AMSA requires flood boat operators to have:

- Current First Aid certificate
- Short Range Operator Certificate of Proficiency (DROCP) (radio operations), and
- Training equivalent to MAR Maritime Training Package Coxswain Grade 2 near coastal course (Cert I)

5.2 Trainers and Assessors

Non-accredited courses must be delivered by a validated trainer or a supporting trainer under the direction of a validated trainer. A validated trainer must meet RTO trainer requirements (for example, hold relevant credentials such as a Certificate IV in Training and Assessment). A supporting trainer will be required to have relevant maritime experience or vocational competencies and deliver training under the direction of a validated trainer.

Only validated assessors can make the final assessment judgment. Validated assessors must be a validated trainer, or hold a current assessor skill set (TAESS00019, TAESS00011, TAESS00001 (or successor)).

5.3 Competency maintenance requirements

SES volunteers will also be required to demonstrate maintenance of competency with 50 days of flood boat operations (operationally or in training) over a 5-year period.

5.4 Emergency services exemption

SES units are under the understanding that they currently conduct flood-boat rescues under *Exemption 24 – Marine Safety (Emergency service vessels)*. The exemption is in force from 1 July 2025 to 30 June 2030.

Exemption 24 permits eligible volunteer emergency services to crew their vessels using trained volunteers without holding the certificate of competency that's usually required.

However, emergency service vessels must still meet the same requirements as other domestic commercial vessels, including:

1. having a valid permission, certification or approval for the vessel, and any operations and activities (such as a non-survey vessel approval, Class C restricted operations vessel approval or a certificate of survey),
2. being listed on a certificate of operation (unless exempt),
3. operating under a safety management system (SMS) that meets the requirements of Marine Order 504, and



4. displaying a unique vessel identifier (UVI) (unless exempt).²

6. Training options under consideration

SESVA was approached to canvas which of the following options would be acceptable to the relevant SES volunteers.

6.1 Option 1

Rewrite existing courses with SES contextualisation. This might also include a "gap course" for existing qualifications. The Flood Rescue Course would be rewritten to bolster towing requirements and additional flood-related skills.

6.2 Option 2

Share training with Marine Rescue WA courses.

6.3 Option3

Have all FRB Operators complete the nationally recognised Coxswain Grade 2 course with an external provider.

6.4 Qualified Trainer/Assessors

Selected trainers/assessors (T/As) will acquire a Cert IV in TAE. This may mean that T/As are possibly District Officers in FRB areas.

7. KEY VOLUNTEER CONCERNS AND EXPECTATIONS

As a result of the meeting held, the SESVA was able to confirm that SES units have concerns with the following:

1. Lack of communication with volunteers and clarity around DFES plans on any implementation of the AMSA requirements.
2. Local Government may need to be involved if owners of the SES vessels.
3. Lack of clarity around the liability of volunteer flood boat operators in the event of a breach of DCV regulations.
4. Workload on volunteers to be trained, and then to maintain that training to AMSA requirements.
5. What is DFES doing to provide SES volunteer flood boat operators with the qualifications, skills and competency maintenance to safely operate flood boats in WA
6. Will DFES invite SES and VMR to collaborate in implementing and communicating these changes?
7. Contextualisation of training is necessary. The FRB environment varies radically across some SES units.

² <https://www.amsa.gov.au/about/regulations-and-standards/exemption-24-marine-safety-emergency-services-vessels>



8. Significant resourcing required by volunteers to attend the perceived required additional training.
9. What compensation for lost volunteer income and out-of-pocket expenses, e.g. medical certificates, is to be made available.
10. Exemption 24 exempts emergency services flood boat operators until 30 June 2030. Now is the time to plan and train for expiry of the exemption.
11. Exemption 24 contains a gap in Schedule 1 on operating between inland waters and those within 3nm of shore/sheltered waters. Will AMSA clarify this?
12. The ongoing burden of meeting new training requirements and maintaining annual currency of competencies is unrealistic for volunteers.
13. The quantitative impact on volunteer time commitment, timings and costs is critical for informing an SES position. Currently, there is insufficient information to make comment.
14. How do the mandated training courses align to the existing SES Flood Boat Rescue course?
15. What would be the required order of qualifications required to be or maintain a Coxswain? Would coxswain certification be a prerequisite for the DFES course? Is a Recreational Skipper's Ticket still required as a prerequisite?
16. If a Coxswain Grade 2 is required, the 10 days of practical experience per year is burdensome, particularly for regional units who only experience limited days per year where suitable waters are available to train or operate on. This would render currency requirements impossible to meet without funded travel to other regions with suitable waters.
17. Does the 10 hours per year mandated of Coxswains' Grade 2 experience required to be at the helm, or does their time as crew also count towards this amount?
18. It appears that the Grade 3 Coxswain course would suit most, if not all, SES flood boat areas (with the possible exception of Rottnest Island and Bunbury) as it covers inland waters, rivers and D-Class waterways. If so, why couldn't SES coxswains complete the Grade 3 instead of the Grade 2? A Grade 3 course costs about \$630.
19. The above limitation on suitable wet climates required to provide certain regions with sufficient conditions to be able to train in boating activities means that volunteers require up to a year of planning to be able to ensure sufficient compliance with mandatory training.
20. SES Trainer Assessors will need to have a Cert IV Workplace Training and Assessment qualification, which is rare for existing SES trainers to have. This is also expensive and will take up to a year to complete part-time, assuming funding is available. This would also exacerbate existing shortages of SES-qualified trainer assessors, and likely also be required of relevant District Officers overseeing relevant units. Natural Hazards District Officers are already under pressure with other regional office tasks.
21. The excessive requirement for training will mean there is no time for volunteers to practice what they have learned and attend callouts, which will impact this critical capability across the state.



22. What assistance is available from Volunteer Marine Rescue, which is relatively much better resourced to manage such training and compliance changes? Are there efficiencies already identified or that can be made to streamline common training needs?
23. Can any concessions be negotiated with AMSA to consider the size of each unit and its available resources, noting WA SES is not one state-wide entity, but individual incorporated bodies that are independent and therefore lacking the corporate resources of many other emergency services nationally?
24. Some SES units operate offshore. Will training be contextualised to support those advanced specialist operators within this specialty operation?
25. Many qualified coxswains are in older age cohorts and will be impacted heavily by changes to medical and physical assessments despite being capable of their responsibilities. These changes will put pressure on flood-boat capabilities across multiple regions.
26. Initial and ongoing burden to crew, coxswains, Team Leaders, Trainer Assessors, Training Managers, Operations Managers and Local Managers will further impact the already limited resourcing available to manage unit operations, in addition to exacerbating the ongoing struggle to recruit and retain SES volunteers.

8. SESVA DRAFT POSITION

Because of the extensive confusion and lack of information provided by DFES, AMSA, and the Department of Transport, impacted SES units are unable to provide a clear position. More specific information will be required for SES units to address their numerous questions and concerns listed above.

Any financial outlay required by SES members to meet mandated medical or physical assessments and training qualification fees should always be borne by DFES.

Volunteers already contribute their time and skills, fuel costs to attend training and callouts, uniform laundering, and loss of income to provide a critical service to the community.

SES units confirmed that should the current lack of information remain unaddressed, all flood boat operations will be forced to cease across WA due to the escalation of existing significant risks for volunteers, particularly liability, safety, training, cost, legal and relevant agency responsibilities.

9. DESIRED OUTCOMES

SES units ask for DFES to urgently consult with relevant regulators and stakeholders, including the Department of Transport, AMSA and WALGA, to provide written guidance to all relevant Local Governments, SES units and the SESVA addressing, at minimum, the key concerns listed in this paper.

Once written guidance and clarity have been provided, the SESVA will be able to facilitate discussions with SES units to obtain an informed view of how best to proceed.



DFES will also need to plan for alternative options while SES units are legally unable to respond to call-outs requiring flood-boat rescue operations during the transition.

10. CONCLUSION

SES units lack sufficient clarity of the training commitment required to comply with AMSA requirements for FRB operators. However, whatever approach DFES takes, there is scepticism about the ability to impose further training commitments on FRB operators.

The simpler approach for SES operators is to make incremental changes to the established training regime while minimizing the impact on unit operational and training capabilities.

The SESVA encourages collaboration among SES volunteers, DFES, and other stakeholders regarding any proposed changes to the training workload and their subsequent operational capability.



Appendix 1

List of SES Units with flood rescue boat profile

The Western Australian State Emergency Service units with flood boats are (3 in metropolitan Perth and 13 regional units):

- August-Margaret River SES
- Australind SES
- Belmont SES
- Bunbury SES
- Busselton SES
- Canning-South Perth SES
- Carnarvon SES
- Collie SES
- Derby SES
- Hedland SES
- Kalbarri SES
- Kununurra SES
- Mandurah SES
- Murray SES
- Nannup SES, and
- Walpole SES.



Appendix 2

Exemption 24 - Marine Safety (Emergency service vessels)

Exemption 24 allows volunteer emergency services to crew their vessels using trained volunteers without a certificate of competency.

In force 1 July 2025 to 30 June 2030

What the exemption allows

Exemption 24 permits eligible volunteer emergency services to crew their vessels using trained volunteers without holding the certificate of competency that's usually required.

This exemption only relates to crew competency. Emergency service vessels must still meet the same requirements as other [domestic commercial vessels](#), including:

- having a valid permission, certification or approval for the vessel, and any operations and activities (such as a [non-survey vessel approval](#), [Class C restricted operations vessel approval](#) or a [certificate of survey](#))
- being listed on a [certificate of operation](#) (unless exempt)
- operating under a [safety management system](#) (SMS) that meets the requirements of Marine Order 504
- displaying a [unique vessel identifier \(UVI\)](#) (unless exempt).

You do not need to apply to use this exemption

Eligibility requirements

To use this exemption, both the crew and organisation must be eligible.

Master and crew

Under exemption 24, masters and crew do not need a certificate of competency if they:

- are undertaking permitted activities (described below)
- meet competency requirements
- are either:
 - a worker (staff or volunteer) of an eligible **volunteer organisation** such as a volunteer marine rescue organisation (VMR), state emergency service (SES) or a volunteer fire service organisation
 - a **volunteer** of other emergency service organisations.

Eligible organisations

The exemption applies to eligible master and crew working on vessels operated by:

- emergency service organisations (ESOs)
- volunteer marine rescue organisations (VMRs)
- fire service organisations (FSOs)

Emergency service organisations:

- are established to provide emergency response, management or disaster relief



- have responsibilities assigned by a state, territory or the Australian Government during emergencies

Examples: SES or surf lifesaving organisations.

Volunteer marine rescue organisations:

- focus on marine rescue, public safety or search activities
- have responsibilities assigned by a state, territory or the Australian Government during emergencies

Fire service organisations:

- prevent or suppress fires
- protect people and property from fire-related danger or harm

Find full definitions of eligible organisations in the exemption.

Permitted activities

Under this exemption, vessels can:

- conduct search and rescue
- emergency or disaster response activities
- fire-fighting
- mitigate threats to public safety
- other related incidental activities

Other incidental activities may include:

- transporting individuals and/or equipment to and from incidents
- training volunteers or employees
- promoting public awareness
- pollution incident support

Excluded activities

Examples of activities not covered under the exemption include:

- charter activities such as scheduled (non-urgent) medical transfers
- towing outside a search and rescue event
- recreational boat licence training
- other commercial activities

Operational judgment

You may need to decide on a case-by-case basis if an operation or activity is permitted.

Example scenarios include:

- unexpected events that are likely to become an emergency without emergency services intervention
- emergency towing to a practical safe haven
- remote area medical transfers where commercial services are not available.

Fees and payments

Under this exemption, organisations:



- **cannot charge fees or seek payment** for any services or activities conducted under the exemption. This excludes government funding arrangements.
- may accept unsolicited donations, including after a rescue.

Commercial activities are not permitted under exemption 24

If your organisation conducts commercial activities, you must comply with the full National Law requirements, including crew competency requirements, while undertaking these activities.

Crewing, training and assessment requirements

To operate under exemption 24, all masters and crew must meet minimum standards, training and assessment requirements for their role. A training record for all masters and crew must be kept.

Crewing requirements

To be a master or crew member under this exemption, a person must:

- be at least 16 years old
- meet medical and eyesight standards
- inform the operator of any relevant long term or permanent medical conditions that could impact their duties
- meet their organisation's internal training and recordkeeping requirements
- only carry out duties or functions if they have met the relevant competency, training and assessment requirements for their role.

Existing certifications and qualifications

People certified by a VMR before 1 July 2018 can continue carrying out duties under that approval.

Masters or crew with a valid National Law certificate of competency can operate within the limits of their certification.

Training requirements by role

Role or function	Requirements
Master a vessel operating in inland waters or personal watercraft (PWC)	• Recreational boating operator licence for relevant state or territory, and • Complete any vessel-specific training provided by the operator OR • Meet 3nm master competency requirements
Crew or deckhand Not required for crew in inland waters or on PWCs Less than 500kW inboard engine	• Current first aid certificate (at least HLTAID011 <i>Provide first aid</i>) • Complete training equivalent to 4 MAR Maritime Training Package units (MARF028, MARF029, MARF060 and MARN008)



Role or function	Requirements
	- Complete an induction provided by the vessel's operator - Any additional units of competency or training required by the vessel's operator
Master up to 3nm from shore or sheltered waters Less than 12m long Less than 500kW inboard engine (no limit on outboard)	- Current first aid certificate (at least HLTAID011 <i>Provide first aid</i>) - Short Range Operator Certificate of Proficiency (SROCP) - Training equivalent to MAR Maritime Training Package Coxswain Grade 2 near coastal course (Cert I) - Internal training on safe towing arrangements - Any additional units of competency or training required by the vessel's operator
Master beyond 3nm (up to 30nm or 50nm in QLD Great Barrier Reef region or Torres Strait Zone) Less than 24m long Less than 500kW inboard engine (no limit on outboard)	- Current first aid certificate (at least HLTAID011 <i>Provide first aid</i>) - SROCP or Long Range Operator Certificate of Proficiency (LROCP) (if fitted with HF radio) - Training equivalent to MAR Maritime Training Package Coxswain Grade 1 near coastal course (Cert II)* - Internal training on safe towing arrangements and search and rescue coordination - Any additional units of competency or training required by the vessel's operator *MAR units <i>Survival at sea using survival craft</i> and <i>Perform basic servicing and maintenance of main propulsion and auxiliary systems</i> are only required if applicable.
Master 12–24m vessels (from 1 July 2026)	- Meet Master beyond 3nm competency requirements - Plus, additional MAR deck and engineering unit requirements from 1 July 2026* *This is due to increased complexity of the machinery, ancillary and auxiliary equipment. Details in the exemption.

MAR training packages

Accredited courses must be delivered by a registered training organisation (RTO).
 Non-accredited courses must be delivered by a validated trainer or a supporting trainer under direction.



A **validated trainer** must:

- meet RTO trainer requirements (for example hold relevant credentials such as a Certificate IV in Training and Assessment).

A **supporting trainer** must:

- have relevant maritime experience or vocational competencies
- deliver training under the direction of a validated trainer.

A validated trainer must oversee and guide training when it's delivered under direction. They ensure the quality of training provided and that it meets the training package requirements.

Assessment

All masters and crew must pass an assessment by a validated assessor confirming competence to undertake their duties (apart from those operating a PWC or in inland waters who instead need to complete the relevant in-house training).

Validated assessors must:

- be a validated trainer, or
- hold a current assessor skill set - TAESS00019, TAESS00011, TAESS00001 (or successor).

A supporting assessor who has relevant maritime experience or vocational competencies can gather evidence for assessment under validated trainer direction. Only validated assessors can make the final assessment judgement.

Multi-agency crewing

You can crew a vessel using volunteers from other eligible organisations under the exemption.

The vessel owner must ensure all crew meet the training and assessment requirements.

The vessel owner must also ensure all masters and crew receive proper induction, safety and emergency training. This is part of the vessel's safety management system as per Marine Order 504.

How to apply

You do not need to apply to use this exemption.

For previous versions of exemption 24, go to [superseded and repealed marine safety exemptions](#).

Related information

- [Consultation feedback report](#)
- [Marine Order 503 \(Certificates of survey—national law\)](#)
- [Marine Order 504 \(Certificates of operation—national law\)](#)
- [Marine Order 505 \(Certificates of competency—national law\)](#)
- [Marine surveyors manual parts 1 and 2](#)
- [National Standard for Commercial Vessels](#)