

Queensland Seafood Industry Association

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Thursday 1st September 2011

Mr Werner Bundschuh
Director
Safety Standards Branch
Maritime Safety Queensland
GPO Box 2595
Brisbane Qld 4001

Dear Werner

Requirement for installation of a fixed fire suppression system on existing vessels

QSIA is aware of the recent notice issue by MSQ on the requirement for installation of a fixed fire suppression system on older fishing vessels to comply with the USL Code standard - to be undertaken by the 1st June 2012.

QSIA has received many calls from concerned fishing vessel operators. The cost of the installation is significant and they are questioning the necessity for this equipment.

As it is the requirement for the installation of this equipment for new vessels is inconsistent. Why should a 10 or 11 meter vessel with an inboard engine be any different from one over 12.5 where installation of a fixed fire suppression system is a necessity to meet survey? It is incongruous that a distinction be made purely on length when the machinery and area of operation is the same and the outcome of such a calamity would also be the same.

QSIA would like to know what evidence there is to support such a requirement for these older vessels. How many engine room fires have occurred in recent years on such older vessels? How effective would a system like this be in the event of a fire on one of these older vessels? QSIA would suggest the following options be considered

- Remove this requirement for the installation of a fixed fire suppression system on older vessels altogether (preferable), or
- Defer the deadline for its introduction.

Thank you in anticipation and I look forward to your earliest reply.

Yours sincerely



Michael Gardner
President