Contents

Introduction 3

Background 3

Demand for Moorings 4

Capacity of Moorings 5

Alternate Mooring Apparatus (reduced scope and fore and aft moorings) 5

Mooring Occupancy 7

Renewal of Mooring Permits 9

Moorings in Recognised Cruising Areas 10

Use of Existing Moorings in Cruising Areas 10

Cruising Moorings 11

Mooring Fees 12

Suitability of Vessels for Moorings 13

Seaworthiness and Disrepair of Moored Vessels 16

Mooring Maintenance 18

Mooring Review Survey Questions 19
Introduction

Marine and Safety Tasmania (MAST) is undertaking a review of the policy and regulatory framework governing the administration of moorings in Tasmania.

The objectives of the review are to:

- ensure fair and equitable access to moorings;
- increase the mooring capacity and efficiency; and
- improve the efficiency of mooring administration, ensuring it is modern and flexible to respond to the growing demand for moorings.

The review is being conducted in two parts:

- public feedback via a survey of recreational boaters, moorings owners and mooring contractors on specific topics discussed in this review; and
- detailed examination of particular issues identified as priorities.

The review provides an explanation of the current arrangements and the challenges posed by an increasing mooring demand across the State, particularly in populated areas of the State’s south-east.

The review is designed to seek stakeholder feedback on a range of issues and potential reforms to help improve the way moorings are managed.

Background

MAST assumed management of moorings in Tasmania when the former Marine Boards corporatised in 1997. There are currently in excess of 4,560 moorings registered in the State. 71% of these moorings are located in the State’s south-east including the River Derwent, D’Entrecasteaux Channel, Huon River and Tasman Peninsula.

Moorings are regulated under the Marine and Safety (Moorings) By-laws 2013 and managed by MAST with the aid of a Geographic Information System (GIS) where all registered moorings are displayed using co-ordinates and a unique registration number. This GIS retrieves information about each mooring from an Access database.
Demand for Moorings

Since MAST’s inception in 1997, the growth in the number of registered vessels has increased dramatically. This can be attributed to a number of reasons including registration of vessels that had been previously illegally unregistered under the previous administration, increased enforcement and an improvement in the state of the economy including a large increase in the value of property that allowed homeowners to use the equity in this property to purchase vessels. The increase in the safety culture of boating in Tasmania is also responsible for a large part of this increase.

More recently, the average growth of recreational vessel registrations over the last six years has been 2.06%. Projections based on this growth rate will see 36,854 vessels registered in Tasmania by the year 2025.

In 2015, 9.63% of the vessels registered in the State were over 7.5m in length, however this rate is also increasing with the percentage of vessels over this length growing at a rate of 2.55% per annum. By the year 2025, the percentage of vessels over 7.5m in length is projected to be 12.39% of all registered vessels, equating to 4,565 vessels. This is a projected increase of 1,671 vessels from the number of vessels over 7.5m in length registered in 2015 that will all require either a mooring or marina berth. It could be assumed that a small percentage of this increase may be trailer boats that will not require a mooring.

The growth in the number of moorings registered in Tasmania also continues to grow. The average growth rate over the last six years has been 3.12% per annum which will result in the projected number of moorings by 2025 increase by 1,690 from the number currently registered in 2015.

Given that 71% of these moorings are located in the south-east of the State, space for an additional 1,200 moorings will be required in the River Derwent, D’Entrecasteaux Channel, Huon River and Tasman Peninsula areas.

The projected demand for moorings mirrors the demand for vessels in the size range that are required to live in the water. This is due to the fact that MAST does not approve mooring applications without the applicant owning, or being in the process of buying a boat.

Whilst it is likely that additional marina berth development will occur in the next 10 years, it is difficult to determine how many berths will be developed and how much of the projected demand will be catered for given that it is likely that some vessels from interstate and vessels owned by people who would not otherwise own a boat without the option to berth it in a marina, will take up a percentage of new marina berths.

It is likely though, that a small percentage of the projected vessel registrations will be accommodated in a marina berth instead of a mooring.
Capacity of Moorings

Whilst MAST does not impose a numerical limit on how many moorings can be located in a particular area, there are a number of considerations to be made before new applications can be approved.

In many areas, geographical limits have been introduced in particular bays on a case by case basis. Factors such as water depth and navigational requirements influence such limits. Access to existing marinas, jetties and boat ramps require the spread of new moorings to be contained. Many of the popular metropolitan mooring areas are now at full capacity including Sandy Bay, Kangaroo Bay, Montagu Bay, Lindisfarne Bay, Geilston Bay, and Pipe Clay Lagoon. In addition to these metropolitan areas, Kettering, Port Cygnet, Coles Bay and East Shelley Beach are also at full capacity.

New marina developments normally require some moorings to be removed to accommodate the development, reducing the capacity of that area. It is assumed that not all of those moored vessels displaced by any new development will require relocation as some may berth in that development.

The need to contain the spread of moorings is also important to ensure that there is sufficient room to provide safe anchorage for other vessels.

Alternate Mooring Apparatus (reduced scope and fore and aft moorings)

Traditional swing moorings take up a large area, as they allow 360 degree swing of the vessel length and mooring chain/rope. Alternatives to traditional swing moorings can reduce the scope of the mooring apparatus and in turn reduce the swing diameter and the amount of area required for each mooring. Alternatives include fore and aft moorings that can either consist of traditional mooring apparatus (block and chain) at each end or piles driven into the seabed. Fore and aft moorings restrict the movement of a moored vessel and therefore allow more vessels to be accommodated in a particular area but are more costly than traditional swing moorings and most Tasmanian mooring areas are exposed and not suitable for fore and aft moorings.

In more recent times, new technologies are providing new alternatives such as elasticised moorings which can greatly reduce the required scope of a mooring. A typical elasticised riser can reduce the scope by up to 50% compared to conventional chain systems with reduced maintenance costs and minimal seabed scour.

The use of alternate mooring systems in Tasmania may have the benefit of reduced mooring swing diameter and increased capacity in new locations but in existing areas if some existing moorings are replaced with an alternate scope-reducing system, extra space between moorings may be achieved but no overall increase in mooring capacity gained. Similarly, due to the different way that scope-
reducing mooring systems may behave compared to conventional systems, more issues between vessels on adjacent moorings may arise.

To achieve increased capacity it would be necessary to relocate all the moorings in a given area to increase overall capacity as a result of the reduction in scope of some or all of those moorings.

**Question:** Should mooring owners be required to transfer to an alternative mooring system in congested areas that will reduce the scope of the mooring?

![Elasticised mooring](image)
Mooring Occupancy

Whilst many of Tasmania's traditional mooring areas are at full capacity, the number of moorings within these areas that are actively being used is very low.

As would be expected, popular mooring areas in holiday locations have a moderate occupancy rate during the holiday periods and extremely low rates during other times. What is more concerning is the low occupancy rate in popular metropolitan areas, where vessels are more likely to be moored permanently. These areas include all the mooring areas within the River Derwent and Oyster Cove, Kettering, Cygnet, Dover, Lewisham and Dunalley.

Below is a list of occupancy rates of popular anchorages (as at July 2015 and January 2016).

Permanent Mooring Areas

<table>
<thead>
<tr>
<th>Location</th>
<th>Occupancy</th>
<th>Number of Moorings</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>July</td>
<td>Jan</td>
</tr>
<tr>
<td>Battery Point / Sandy Bay</td>
<td>50%</td>
<td>45%</td>
</tr>
<tr>
<td>Cornelian Bay</td>
<td>34%</td>
<td>50%</td>
</tr>
<tr>
<td>Cygnet</td>
<td>66%</td>
<td>79%</td>
</tr>
<tr>
<td>Devils Elbow, Tamar</td>
<td>46%</td>
<td>59%</td>
</tr>
<tr>
<td>Dunalley</td>
<td>57%</td>
<td>54%</td>
</tr>
<tr>
<td>Dover</td>
<td>35%</td>
<td>33%</td>
</tr>
<tr>
<td>Geilston Bay</td>
<td>64%</td>
<td>64%</td>
</tr>
<tr>
<td>Kettering</td>
<td>56%</td>
<td>56%</td>
</tr>
<tr>
<td>Lewisham</td>
<td>48%</td>
<td>49%</td>
</tr>
<tr>
<td>Lindisfarne Bay</td>
<td>60%</td>
<td>54%</td>
</tr>
<tr>
<td>Kangaroo Bay</td>
<td>69%</td>
<td>63%</td>
</tr>
<tr>
<td>Montagu Bay</td>
<td>58%</td>
<td>51%</td>
</tr>
<tr>
<td>Taranna</td>
<td>63%</td>
<td>54%</td>
</tr>
</tbody>
</table>
Holiday Mooring Areas

<table>
<thead>
<tr>
<th>Location</th>
<th>Occupancy</th>
<th>Number of Moorings</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>July</td>
<td>Jan</td>
</tr>
<tr>
<td>East Shelley Beach</td>
<td>5%</td>
<td>26%</td>
</tr>
<tr>
<td>Coles Bay</td>
<td>10%</td>
<td>35%</td>
</tr>
<tr>
<td>Louisville Point</td>
<td>0%</td>
<td>37%</td>
</tr>
<tr>
<td>Murdunna / Sommers Bay</td>
<td>25%</td>
<td>35%</td>
</tr>
<tr>
<td>Nubeena / White Beach</td>
<td>23%</td>
<td>43%</td>
</tr>
<tr>
<td>Pirates Bay</td>
<td>32%</td>
<td>49%</td>
</tr>
<tr>
<td>Port Arthur</td>
<td>24%</td>
<td>37%</td>
</tr>
<tr>
<td>Stewarts Bay</td>
<td>3%</td>
<td>39%</td>
</tr>
<tr>
<td>The Fisheries, Coles Bay</td>
<td>0%</td>
<td>60%</td>
</tr>
<tr>
<td>West Shelley Beach</td>
<td>0%</td>
<td>11%</td>
</tr>
</tbody>
</table>

The average occupancy rate for areas that mainly accommodate permanent mooring of vessels is 55% (Summer) and 54% (Winter) whilst the rate for traditional holiday areas is 37% during summer only. When the total number of moorings in these locations is considered, this equates to a large number of moorings that are not used.

The number of existing moorings that are currently under-utilised equates to a significant proportion of the projected demand for new moorings over the next 10 years. Increasing the occupancy rate of these moorings would reduce the future demand for moorings and limit any further geographical spread.

It may be necessary in the future to cancel the permit of a mooring unless owners can prove that their mooring is being regularly used or rented to another boat owner. This would remove unoccupied moorings from the water providing space for a proportion of the projected future demand.

Question: Should mooring owners be required to prove that their mooring is being regularly used?

Question: Should moorings be cancelled if they are not being used?

Question: How can MAST increase the occupancy rate of existing moorings?
Renewal of Mooring Permits

Transfer of mooring ownership – not permitted for new moorings after 1 January 2014

Traditionally, mooring permits in Tasmania have been transferrable, meaning that once an owner no longer has a use for a registered mooring or it is no longer suitable for his intended use, he can sell the mooring tackle and the mooring permit will be transferred to the new owner.

Essentially, all a mooring owner is selling is the mooring tackle, but moorings located in a prime location with a current permit do command higher prices than an identical mooring in a less desirable location. A mooring’s location may be seen as desirable due to its proximity to the shore or support services such as dinghy storage and car parking or due to its location being in an area of high demand which may be closed to new moorings. The transfer of ownership of the mooring permit is permitted for all moorings that were issued prior to 1 January 2014.

Whilst it was never the intent of the legislation controlling mooring permits to allow them to appreciate in value or become investments, as the demand has increased and some areas have been closed to new moorings the value of moorings has increased and will continue to do so. It is essential that there is equity in the opportunity for mooring ownership.

To achieve this, one option is to make all existing mooring permits non-transferrable, requiring them to be returned to MAST when no longer required by the owner. Any requirement to make such moorings non-transferrable would require an introduction date no sooner than five years from the date that the change of legislation would be advertised to ensure that those people who have previously purchased moorings for a considerable sum are able to use that mooring and realise their previous investment. Should the owner no longer require the mooring then he would be permitted to rent the mooring, hence recouping some of the investment or it would be returned to MAST.

Returning the permit to MAST allows the permit to be reallocated to a vessel owner on a waiting list and gives MAST a greater control to issue that permit to the person who has been waiting the longest, provided the mooring permit is suitable for the vessel, otherwise it would be issued to the owner of the next suitable vessel on the list.

Most importantly, it would provide an equitable system compared to the current scenario where a person on a waiting list would be issued the mooring rather than a boat owner who has the capacity to pay the asking price.

Any mooring that has been issued since 1 January 2014 is legally not permitted to be transferred. Whilst the mooring tackle can be sold in the event that an owner no longer requires the mooring, the permit is required to be returned to MAST where it is allocated to the next person requiring a mooring in that area provided their approved length requirement is similar.
To enable this to occur, MAST currently keeps waiting lists for all those areas that are closed to new moorings so that people wanting a mooring can be accommodated should a mooring permit be cancelled and returned for re-issue.

**Question:** Should all moorings issued prior to 1 January 2014 be made non-transferrable?

If yes, what legislation introduction date would be fair?

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**Moorings in Recognised Cruising Areas**

Cruising anchorages are located in the D’Entrecasteaux Channel, parts of the Tasman Peninsula and some areas on the East, and North Coasts. Typically these anchorages are used for casual overnight anchoring by vessels cruising Tasmanian coastal waters.

Some of these anchorages adjoin private land holdings so in some circumstances MAST will allow moorings in these areas. MAST’s policy for assessing new mooring applications in traditional cruising areas is as follows:

- only applications from adjacent landowners for positions in cruising anchorages will be assessed;
- applications for any area outside recognised mooring areas, or areas where there are no or very few existing moorings will be forwarded to Tasmanian yachting and cruising clubs and associations for comment;
- applications by landowners for a mooring adjacent to their property may be allowed provided that its position does not generally interfere with traditional anchoring locations and future renewal will be dependent on the mooring owners continued ownership of the adjacent property; and
- existing moorings are transferable only to adjacent property owners.

**Use of Existing Moorings in Cruising Areas**

Protocol for the use of existing moorings in cruising areas, is as follows:

- if more than one boat wishes to use the mooring at a time they must raft up together no later than one hour before sunset, providing anchored vessels are unaffected. (This optimises the available space since the rafted boats don’t have a swing distance and provides more room for vessels to anchor); and
- vessel owners who wish to lay on a mooring cannot displace other boats anchored in the anchorages provided those anchored boats arrive one hour before sunset.
Cruising Moorings

MAST own and maintain 13 public moorings around the Tasmanian coastline in popular cruising anchorages including Lady Barron, Coles Bay, Maria Island, East Shelley Beach, Dunalley, Port Arthur, Nubeena and Taranna. Each of these moorings is located in recognised mooring areas. In addition to the MAST moorings, there are in excess of 25 moorings in cruising areas owned by various boating clubs for use by their members.

MAST has resisted locating additional public moorings in more remote, pristine or iconic cruising anchorages. MAST has previously received requests for moorings in locations such as Wineglass and Reidle Bays on the East Coast and Tinpot and Mickey Bays in the D’Entrecasteaux Channel. MAST considers that moorings in these locations have a significant visual impact and would only be used during the traditional summer boating season from October to April. Even then there would be days when moorings would not be used.

MAST considers that cruising boats should be self-sufficient in deploying and retrieving ground tackle so the benefit of providing cruising moorings would be low.

Additionally, the cost to service moorings in these anchorages would be high due to their remote location compared to the existing public moorings which are currently serviced by contractors in conjunction with other moorings in the same anchorage.

**Question:** Should cruising moorings be installed in remote and pristine anchorages?
Mooring Fees

The annual fees for mooring permits are included in the *Marine and Safety (Fees) By-laws 2010*. These by-laws include a mooring application fee, issuing of a mooring permit, renewal of a mooring permit and a fee for the transfer of ownership of a mooring permit. The current application fee (2015-16) is $51.34 and the issuing and renewal fees are both $75.50 per annum.

Fees are subject to annual Consumer Price Index (CPI) increases and like all boating-related fees are collected by Marine and Safety Tasmania and only spent delivering marine functions including boating safety and infrastructure delivery and management. Mooring permit fees directly fund the cost of mooring administration, management and compliance.

The mooring permit and renewal of mooring permit fees are currently common fees regardless of the approved length or location of the mooring permit unlike some other states, such as NSW, that determine mooring fees based on the vessel length and location. Some examples of NSW fees are included in the table below:

**Examples of NSW Private Mooring Fees**

<table>
<thead>
<tr>
<th>Vessel Class</th>
<th>High Rate Area</th>
<th>Medium Rate Area</th>
<th>Low Rate Area</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>East Sydney Harbour</strong></td>
<td><strong>Rest of Sydney Harbour &amp; Pittwater</strong></td>
<td><strong>Rest of State</strong></td>
</tr>
<tr>
<td>Up to 7m</td>
<td>$485.00</td>
<td>$311.00</td>
<td>$208.00</td>
</tr>
<tr>
<td>8.01m-9.00m</td>
<td>$811.00</td>
<td>$523.00</td>
<td>$298.00</td>
</tr>
<tr>
<td>9.01m-10.00m</td>
<td>$974.00</td>
<td>$629.00</td>
<td>$343.00</td>
</tr>
<tr>
<td>10.01m-11.00m</td>
<td>$1,137.00</td>
<td>$735.00</td>
<td>$388.00</td>
</tr>
<tr>
<td>11.01m-12.00m</td>
<td>$1,460.00</td>
<td>$943.00</td>
<td>$515.00</td>
</tr>
</tbody>
</table>

As larger vessels take up more space, reducing the capacity of mooring areas, vessel length should be considered as part of any review of the current fee structure in Tasmania.

There are also a large number of registered moorings whose actual boat size is considerably less than the approved boat length for that mooring. This results in a small vessel rendering a large amount of water unusable so the approved boat length rather than actual boat length should be used as the basis for any revised fee structure.

Should such a fee structure be implemented, many mooring owners may reduce the approve vessel length on their mooring permit as a way to reduce the annual renewal fee. This may then give MAST the flexibility to adjust the location of that mooring and/or adjacent moorings which may provide enough space for an additional mooring to be laid.
In such circumstances, it may not be possible for the owner of such a mooring to increase the approved vessel length at a later date in the event that they wish to purchase a larger vessel or sell the mooring.

Example of Possible Fee Structure for Tasmanian Moorings

<table>
<thead>
<tr>
<th>Approved vessel length</th>
<th>Proposed Annual Renewal Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 7.50m</td>
<td>$ 75.00</td>
</tr>
<tr>
<td>7.5m-10.00m</td>
<td>$ 100.00</td>
</tr>
<tr>
<td>10.01m-12.00m</td>
<td>$ 125.00</td>
</tr>
<tr>
<td>12.01m-15.00m</td>
<td>$ 150.00</td>
</tr>
<tr>
<td>15.01m – 20.00m</td>
<td>$ 300.00</td>
</tr>
<tr>
<td>20.00m – 50.00m</td>
<td>Determined by MAST Board based on type and length of vessel</td>
</tr>
</tbody>
</table>

**Question:** Should mooring fees be calculated based on approved vessel length?

**Suitability of Vessels for Moorings**
Types of vessels

Current regulations do not specify vessel length restrictions for mooring permits in Tasmania. Introduction of a minimum vessel length would not increase the capacity of moorings greatly. Unlike NSW, where 36% of vessels on private moorings are less than 7.5 metres, Tasmania does not have the same proportion of trailerable vessels using moorings.

Ramp facilities for trailer boats in Tasmania are very good and the number of launching facilities compared to the number of registered vessels is much higher in Tasmania compared to other states like NSW, particularly compared to the Sydney Harbour and Pittwater areas.

This means that most vessels of that length in Tasmania are kept on trailers. The majority of trailer boats that do use moorings are those owned by shack owners who moor their boats at holiday locations for short periods. This results in a large number of moorings without vessels for much of the year but does reduce ramp congestion in busy holiday periods. As these locations are outside metropolitan areas, the demand for additional moorings for use outside holiday periods is low.

With the significant growth of aquaculture in Tasmania, the number of support vessels required is also increasing. Similarly, as marine farming is spreading into more exposed locations the average size of those support vessels is also increasing.

Such vessels that are moored within existing aquaculture leases do not require a separate mooring permit but operators wishing to moor vessels outside these lease boundaries are subject to mooring permit approval by MAST.

Like all moorings, their suitability in a given location is considered as part of the assessment. In future, the assessment of the suitability of these vessels and large recreational vessels over 20.0m metres in length, should also require the operator to provide engineering design for the mooring apparatus.

Large aquaculture vessels have a considerable swing diameter. Whilst mooring fees could be charged commensurate with the approved vessel length on the permit, a cheaper fee could be applied when such vessels are moored in a fore and aft method as less area is used.

**Question:** Should owners of large vessels be required to provide certified engineering design with their mooring application?
The majority of vessels on moorings are either recreationally registered or hold commercial survey or registration. There are a very small number of moored vessels that do not fit into these categories as they are unpowered.

At times, MAST is required to contact or prosecute owners of vessels on moorings and it is sometimes very difficult to contact an owner of a vessel that is not registered as MAST does not hold ownership details. There have also been cases where unregistered vessels have illegally used a mooring that does not belong to them so that the mooring owner is also not able to provide MAST with boat ownership details.

For this reason it is necessary to consider the requirement for any vessel that is kept on a mooring to be in survey or require registration regardless of whether it has an engine or not. Should a vessel not fall within either of those two categories then it would be required to be removed from the water within a given time period and if returned to the water, returned in a seaworthy condition.

Question: Should any vessel kept on a mooring be required to be registered regardless of whether it has an engine?
Seaworthiness and Disrepair of Moored Vessels

Unseaworthy vessels on moorings are becoming an increasing issue. Aside from the visual impact of neglected, derelict or unseaworthy vessels, such vessels can also result in safety concerns and damage to other vessels if they sink or break free from their mooring. Additionally, there is a significant environmental risk with sunken vessels and difficulty in ordering owners of these vessels to remove them that often requires court action.

Currently, the Marine and Safety Authority Act (1997) deem a vessel unseaworthy if:

- **a)** in the case of a commercial vessel, it does not have a current certificate of survey; and
- **b)** in the case of a vessel other than a commercial vessel, it is certified to be unseaworthy by a marine surveyor or naval architect.

The Act allows the Authority to serve a notice on the owner of the vessel requiring him or her to:

- **a)** put the vessel into seaworthy condition within such reasonable period as may be specified in the notice; or
- **b)** relocate the vessel within such a period.

However, should a vessel owner not comply with such a notice, it requires the Authority to prosecute via the court process. This is not satisfactory and a review of the legislation should provide the Authority with a more flexible approach to managing unseaworthy vessels.
The term unseaworthy is difficult to define when managing vessels on moorings. The unseaworthiness of a vessel is dependent on its intended use or area of operation. Any new definition should relate more to the vessel’s ability to undertake an intended voyage or specific task rather than just relying on someone’s interpretation of seaworthiness.

A revised definition of unseaworthiness could state that:

a) in the case of a commercial vessel, it does not have a current certificate of survey; or
b) in the case of a vessel other than a commercial vessel its condition is deemed unseaworthy by the Authority to undertake its intended use or voyage.

Often evidence that a vessel is being neglected is the first step in the vessel ultimately becoming unseaworthy in the future, so having the power to issue infringement notices to ensure that vessels are kept in good condition may deter vessel owners from letting vessels get to such a condition. Such legislation may require:

- the vessel to be kept neat and tidy;
- the vessel to be kept free of bird droppings, vermin and insects;
- painted surfaces to be free from peeling, flaking or other deterioration;
- metal surfaces to be kept free of significant amounts of rust; and
- marine growth on the vessel’s hull to be kept to a standard acceptable to MAST.

Some vessels that appear to be in poor condition are often in fact subject to active repair by the owner. In such circumstances, enforcement of the above conditions would be waived after the granting of written approval from MAST.

**Question:** Should there be legislation requiring vessel owners to maintain their vessels to a certain standard?
Mooring Maintenance

A poorly maintained mooring can result in failure of the device with expensive consequences not only for the vessel owner but for owners of other moored vessels.

The rate of deterioration of a mooring varies from location to location. *The Marine and Safety (Moorings) By-laws 2013* require that a mooring be maintained in good order and condition and lifted and inspected at least once every two years. Provision of evidence is currently not a condition of permit renewal but proof of service must be provided if requested by MAST.

Some mooring owners may find that their vessel insurance policies are void if they have not followed local statutory regulations such as mooring maintenance frequency.

Other state jurisdictions have regulations requiring provision of a service report from a mooring contractor as a condition of permit renewal. If such a requirement was introduced in Tasmania, as some moorings are serviced by owners a statutory declaration process would need to be included. Such a change would lead to an increased administration burden deeming it unviable.
Mooring Review Survey Questions

A survey form with the questions posed in this Review is available to be completed and electronically lodged on the MAST website at [www.mast.tas.gov.au](http://www.mast.tas.gov.au).