

27 March 2015

Rosemary Carlin
Coroner
Coroners Court of Victoria
65 Kavanagh Street
SOUTHBANK, VIC 3006



Dear Coroner

RE: Coronial Investigation of Karen LEE
Court Ref: COR 2012 005122

I am writing in response to your letter dated 30 January 2015 which attached the Finding Into Death Without Inquest in this matter dated 5 January 2015.

Standards Australia Limited (**Standards Australia**) provides the following information in response to Recommendations 1 and 2.

Recommendation 1

That consideration be given by Standards Australia and relevant stakeholders to amending the Australian Standards so as to require periodic assessment of qualified SCUBA divers in key techniques including, but not limited to, buoyancy control.

Recommendation 2

That consideration be given by Standards Australia and relevant stakeholders to amending the Australian Standards so as to require Dive Charter operators to ensure divers carry a SMB [surface marker buoy] and are instructed to use it properly.

Background

1. In 2014, Standards Australia sought project proposals from stakeholders regarding the proposed revision of AS/NZS 2299.3 *Occupational diving operations – Recreational industry diving and snorkelling operations* and standards from the AS 4005 series, *Training and certification of recreational divers*.
2. On 31 March 2014, the following standards were published by the International Organisation for Standardization (**ISO**):
 - a. ISO 24801-1:2014 *Recreational diving services – Requirements for the training of recreational scuba divers – Part 1: Level 1 – Supervised diver*,
 - b. ISO 24801-2:2014 *Recreational diving services – Requirements for the training of recreational scuba divers – Part 2: Level 2 – Autonomous diver*,

- c. ISO 24801-3:2014 *Recreational diving services – Requirements for the training of recreational scuba divers – Part 3: Level 3 – Dive leader*;
- d. ISO 24802-1:2014 *Recreational diving services – Requirements for the training of scuba instructors – Part 1: Level 1*;
- e. ISO 24802-2:2014 *Recreational diving services – Requirements for the training of scuba instructors – Part 2: Level 2*;

which complement an existing ISO standard, ISO 24803:2007 *Recreational diving services – Requirements for recreational scuba diving service providers*.

3. In August 2014, Standards Australia received a draft, incomplete project proposal from The South Pacific Underwater Medicine Society (**SPUMS**) proposing the revision of AS 4005.1, however that proposal was not finalised or submitted to Standards Australia for formal consideration.
4. In September 2014, Standards Australia wrote to Technical Committee CS-083 regarding the possible withdrawal of the AS 4005 series. Based on the responses received by Standards Australia from Technical Committee CS-083 and other communications with stakeholders, it was determined that:
 - a. the following standards would be withdrawn:
 - i. AS 4005.1 SUPP 1-2000 *Training and certification of recreational divers - Minimum entry-level SCUBA diving - Medical form for prospective recreational SCUBA divers*;
 - ii. AS 4005.1 SUPP 2-2000 *Training and certification of recreational divers - Minimum entry-level SCUBA diving - Statement of health for recreational diving*;
 - iii. AS 4005.1-2000 *Training and certification of recreational divers - Minimum entry-level SCUBA diving*;
 - iv. AS 4005.2-2000 *Training and certification of recreational divers - Recreational SCUBA dive supervisor*;
 - v. AS 4005.3-2000 *Training and certification of recreational divers - Assistant SCUBA instructor*;
 - vi. AS 4005.4-2000 *Training and certification of recreational divers - SCUBA instructor*, and
 - vii. AS 4005.5-2000 *Training and certification of recreational divers - SCUBA instructor trainer*, and
 - b. AS/NZS 2299.3 *Occupational diving operations – Recreational industry diving and snorkelling operations* would be considered for revision.
5. The withdrawal of the AS 4005 series took effect from 13 February 2015


Proposed further activities

6. Standards Australia proposes to undertake the following activities in response to the Coroner's recommendations:
 - a. Standards Australia is planning to convene an Industry Forum to:
 - i. seek more involvement from industry in connection with the development of standards relating to diving;
 - ii. discuss the possibility of adopting the ISO standards that are listed in this letter above as Australian Standards, to replace the AS 4005 series; and
 - iii. discuss the possible revision of AS/NZS 2299.3.

That Industry Forum is scheduled to take place on Monday 25 May 2015.

- b. After the Industry Forum takes place, Standards Australia intends to call upon the relevant technical committee involved in the development of:
- any proposed adoption of ISO standards for diving; and
 - any revision of AS/NZS 2299.3;
- to consider including within one or more of those Australian Standards:
- a requirement for periodic assessment of qualified SCUBA divers in key techniques including, but not limited to, buoyancy control; and
 - a requirement for Dive Charter operators to ensure divers carry a surface marker buoy (SMB) and are instructed to use it properly.
7. Details of the processes by which Australian Standards are developed are set out in Standards Australia's standardization guides, which are available online at http://www.standards.org.au/StandardsDevelopment/Developing_Standards/Pages/Standardisation-Guides.aspx. Any queries in relation to this matter and the standards development process may be directed to Alison Scotland at 02 9237 6088 and alison.scotland@standards.org.au.

Yours sincerely



Kareen Riley-Takos
General Manager, Standards Development