



20 May 2024

The Registrar  
Coroners Court of Victoria  
65 Kavanagh Street  
Southbank 3006  
By email: [cpuresponses@coronerscourt.vic.gov.au](mailto:cpuresponses@coronerscourt.vic.gov.au)

**Court Ref: COR 2021 001123**

Dear Registrar

**Investigation into the death of John Gregg**

Thank you for your letter dated 23 February 2024 in relation to the findings by Coroner McGregor into the death of Mr John Gregg.

Standards Australia acknowledges the tragic circumstances in which Mr Gregg lost his life. We express our sincere condolences to his family and loved ones.

**Background**

By way of background, Standards Australia is Australia's leading independent, non-governmental standards organisation. We are also Australia's representatives to the International Organization for Standardization (ISO) and International Electrotechnical Commission (IEC).

Standards Australia does not initiate standards development projects without stakeholder support. Rather, a project to prepare a new Standard, revise an existing one or propose participation internationally at ISO or IEC, can only commence with the support of external stakeholders, such as government, industry or trade association, professional body, consumer organisation or an individual.

**Recommendations directed to Standards Australia**

We note that Coroner McGregor made the following recommendations in relation to Standards Australia:

*That consideration be given by Standards Australia and relevant stakeholders to amending the Australian Standards so as to require recreational dive providers to:*

- a) ensure divers under their supervision understand the medical conditions which elevate the risks associated with diving and the importance of accurate and forthright medical screening;*

- b) *require all divers over 45 years of age under their supervision to complete and produce a current dive medical for all dives over 18 meters (deep dives).*
- c) *require all divers under their supervision to demonstrate an understanding and proficiency in emergency drills for all dives over 18 meters, including removal of weights and buddy breathing.*

*That consideration be given by SA and relevant stakeholders to amend the Australian Standards to require recreational dive charter operators to carry:*

- a) *adequate medical equipment available at the dive site for immediate use if required, including oxygen resuscitation equipment. Oxygen equipment should be capable of providing a spontaneously breathing patient with an inspired oxygen concentration of 100%. The equipment should also facilitate oxygen enriched artificial ventilation of a non-breathing patient.*
- b) *An Automated External Defibrillator (AED).*

### **Relevant Australian Standards**

In this instance, the standards most relevant to the Coroner's recommendations that are maintained by Standards Australia are the following Australian adoptions of international ISO standards in relation to Recreational Diving Services:

1. AS ISO 24801.1:2021 *Recreational diving services – Requirements for the training of recreational scuba divers, Part 1: Level 1 – Supervised diver*
2. AS ISO 24801.2:2021 *Recreational diving services – Requirements for the training of recreational scuba divers, Part 2: Level 2 – Autonomous diver*
3. AS ISO 24803:2021 *Recreational diving services – Requirements for recreational diving providers*

Based on our review of the above standards, it appears to us that many of the Coroner's recommendations are in substance covered by requirements in the above standards.

For example, AS ISO 24801.1:2021 and AS ISO 24801.2:2021 set out certain health requirements as prerequisites for taking part in training courses. These standards require documented evidence the student has been medically screened as suitable for recreational diving. If the student is not examined by a physician, the student must confirm by signature that he or she has understood written information given by the scuba instructor on diseases and physical conditions which can pose diving related risks. It also states students shall be advised on the importance of appropriate regular medical examinations.

Both standards also specify required theoretical knowledge such as avoiding medical problems resulting from increasing or decreasing pressure or other hazards. For the training of autonomous divers under AS ISO 24801.2:2021, this also includes appropriate knowledge of emergency procedures, accident management and diver assistance (self/buddy) as well as first aid after diving incidents.

Both standards also require that students have demonstrated capacity in scuba skills such as under-water and surface buoyancy control and surface operation of the quick release of the weight ballast system. AS ISO 24801.2:2021 expands these requirements for autonomous divers to include knowledge of procedures allowing a scuba diver to ascend to the surface in the event of an out-of-breathing gas situation, acting as both receiver and donor.

AS ISO 24803:2021 sets out requirements for recreational scuba diving providers that include an assessment of the competency and qualifications of each diver prior to diving, including the currency of the recreational qualification and of the last dive and current fitness to dive. Prior to each diving session, service providers must also identify emergency procedures to clients and provide information on the prerequisites in order to obtain the service (e.g. medical certification).

Service providers must also ensure the availability of a suitable first aid kit and communication system for alerting emergency services as well as an emergency oxygen unit with a capacity of delivering at least 15 l/min of pure oxygen for at least 20 min. This standard also notes that it is good practice where possible for service providers to provide an emergency oxygen system delivering an inspired oxygen concentration of up to 100% and to a non-breathing patient receiving respiratory resuscitation at an inspired oxygen concentration of at least 50%, with sufficient capacity to continue delivering oxygen until alternative emergency medical care is available.

### **Development of ISO Standards**

As Australia's member to ISO, Standards Australia co-ordinates the attendance of Australian experts at international meetings and can participate in the preparation of International Standards.

As noted above, the Australian Standards relating to recreational diving are national adoptions of international standards developed by ISO. Any changes to the base ISO standards need to be considered by the relevant international technical committee, which in this case is ISO/TC 228 - Tourism and related services.

Standards Australia will notify ISO/TC 228 of the Coroner's recommendations and ask it to consider whether in light of the recommendation any amendments should be made to the relevant standards for example, to include requirements for service providers to carry an Automated External Defibrillator.

If ISO publishes revised versions of these standards, Standards Australia can then consider adopting them as national standards.



Yours sincerely

A handwritten signature in blue ink, appearing to read 'Christina Forsyth', written in a cursive style.

Christina Forsyth  
General Counsel  
Standards Australia Limited