



Key Issues

from the Community Engagement
Programme

Qualifications and Operational Limits
Review

Copy for industry comment

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ACKNOWLEDGEMENTS

We wish to thank all of the people who freely gave their time to take part in the community engagement programme for the Qualifications and Operational Limits Review and also those who have taken the time and effort to provide written submissions. Maritime New Zealand has benefited significantly from the open and frank feedback received.

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PURPOSE OF REPORT

The first phase of the Maritime New Zealand (MNZ) qualifications and operational limits review, a community engagement programme, has now been completed and this report documents the key issues raised in this initial phase. The purpose of this report is to:

- Report on the progress of MNZ's review of maritime qualifications and associated operational limits (QOL Review).
- Present industry concerns with current qualifications and operational limits as identified during the recent community engagement programme and the key issues to emerge from this.
- Provide the maritime community and MNZ with the opportunity to comment on the issues identified in this report.

BACKGROUND

MNZ commenced a fundamental review of commercial qualifications and associated operational limits in April 2009. The current qualifications and operational limits framework has been revised in an ad hoc way and is outdated, confusing and difficult to administer. It needs to change.

The QOL Review aims to develop a clear and logical framework for qualifications and operational limits to meet the needs of New Zealand's commercial maritime sector now and in the future:

- To better support New Zealand's commercial maritime sector, which is a key contributor to our economy.
- To provide relevant qualifications and appropriate operational limits to meet sector needs while ensuring the safety of vessels, their crew, passengers and cargo, and protection of the marine environment.
- To remove barriers to attracting and retaining skilled and experienced people in the commercial maritime sector in the face of a worldwide skills shortage.
- To make the qualifications and operational framework easier to understand and administer.

The review is the first step in a long-term programme to rationalise and update maritime qualifications and better align them with operational limits. Rules likely to be impacted by the review include: Maritime Rule Part 32 (ship's personnel – qualifications), any associated changes to Rule Part 20 (operating limits), Rule Parts 31 A, B and C (crewing and watchkeeping), Rule Part 34 (medical standards) and Rule Part 35 (training and examinations).

QOL REVIEW TIMELINE

July to November 2009	Interviews with maritime community	Completed
January 2010	Summary of key issues released for comment	Completed
September 2010	Proposed framework released for consultation	
Timing to be confirmed	Finalised proposal reviewed with industry representatives	
March 2011	New qualifications and operational limits framework due to be delivered	

EXECUTIVE SUMMARY

Key issues

Most of the key issues relate to domestic qualifications (LLO, ILM, NZOW and NZOM) and vessels operating within coastal, inshore and enclosed limits. It is apparent from the meetings held with maritime community representatives that there is a lot of misunderstanding or misinterpretation of the rules due to their complexity and the way information on qualifications and operational limits is presented. Commercial operators are frustrated by not being able to easily determine their obligations and privileges.

The issues raised in the community engagement programme and summarised in this report will be one of several key inputs to the design of the new qualifications and operational limits framework along with international standards and other maritime obligations. A summary of key issues raised by the maritime community follows:

Barriers to entry

- Entry to the commercial maritime sector is constrained by the lack of recognition given to experience and skills gained in both the commercial and recreational sectors.

Career progression

- It is not easy to plan a career that spans multiple industry sectors and know from the outset what experience or qualifications will be required at each stage.
- The current qualifications framework makes it difficult to transfer between sectors.
- The current qualifications framework does not recognise a separate and specific “inshore industry” or provide a career path for it.

Qualifications

- Quality of qualifications must be retained.
- Current qualifications and operational limits are focused on sea time rather than experience and competence.
- Qualifications and syllabuses have not kept up to date with new technology advances in engineering, navigation and communications.
- There are problems with getting domestic and super yacht qualifications recognised overseas.
- There is no appropriate qualification for small work boats operating in either very restricted or multiple areas.

Engineering

- The current link between distance offshore and level of engineer required is not appropriate and has a high cost impact on operators.
- The engineering syllabus for MEC 4, MEC 5 and MEC 6 is out of date and not appropriate for smaller vessels and modern engines.

Endorsements

- Endorsements should be used as a means of demonstrating competence for specific skills, experience and types of operation.
- ILM is the core qualification at the heart of commercial operations in the industry in New Zealand but does not provide sufficient competence for the higher end privileges of the ILM qualification.

Sea time

- The current method of calculating sea time is open to abuse and does not ensure “quality sea time” is obtained.
- Coastal sea time is hard to get and is a barrier to obtaining the NZOM qualification, in particular when required for inshore operators.

Operational limits

- There is a high demand for a 100 nm fishing limit to be reintroduced to align more appropriately with fishing areas, eg, 200 metre contour.
- The current 12 nm inshore limit is based on the territorial limit and does not allow for practical transit routes between locations.

- The inshore limit does not take into account increases in vessel speed and technological advances in navigation and engineering that make it possible to travel further from the coast and still be able to access a safe haven.
- There is no flexibility to allow vessels to operate beyond the limits of their qualification for specified periods to suit certain fisheries or other activities.
- Passenger/non-passenger and fishing operators wish to operate within the offshore limit to the extent of the Exclusive Economic Zone (EEZ).

Revalidation

- Any changes regarding revalidation must consider the impact, costs and benefits and demonstrate that there is a safety benefit.

Syllabuses

- Syllabuses are very out of date, too theoretical and do not reflect modern technology in engineering and navigation, eg, chart plotters, GPS, computerised engines, modern outboard motors.
- There is too much large merchant shipping influence on syllabuses for lower grade qualifications.
- There is a lot of repetition between the syllabus and courses for LLO, ILM and NZOW.

Training

- Training is repetitive and does not recognise prior learning.
- Individuals are required to repeat training unnecessarily as they progress through different certificates. This makes training long and expensive.
- People find it hard to get on training courses at suitable times due to the limited number of courses.
- Courses are believed to be unnecessarily long to suit schools and government funding mechanisms rather than candidates.
- There is limited uptake of unit standards due to lack of understanding and misalignment of MNZ and NZQA qualifications.

Industry specific training under Part 35

- Although Part 35 is well regarded it imposes management overheads on participating organisations.
- There have been no regular audits of Part 35 by MNZ to ensure compliance and competence of trained candidates.

Examinations

- There is no practical component to the examination process and therefore candidates don't have to demonstrate competence.
- Qualifications and syllabuses have not kept up to date with new technology advances in engineering and navigation, and examinations reflect this.
- Examination questions are sometimes theoretical and not relevant for domestic qualifications.

Application of STCW

- The STCW basic safety training course, which requires full fire training with breathing apparatus, is excessive, expensive and provides no lasting benefit for operators of smaller vessels.

Other

- Communication on previous changes to qualifications and operational limits has not been effective or adequate.
- Interaction between the maritime community and the MNZ Licensing Team is not always satisfactory.

COMMUNITY ENGAGEMENT PROGRAMME

The first step in the QOL Review, a comprehensive community engagement programme, was undertaken from 20 July to 6 November 2009.

- This in-depth information gathering exercise involved interviews with a wide cross section of the maritime community, including MNZ staff, by QOL Review Project Manager, Bridget Carter and Principle Maritime Advisor, John Mansell.

- It aimed to ensure that MNZ has a clear understanding of the business and operational requirements of the various industry sectors prior to commencement of the design of a new qualification and operational limits framework.
- Discussions focused on what works – and doesn't work – with existing qualifications and operational limits and what changes are required.
- 139 interviews were conducted with 434 people in 12 regions. 30 written submissions were also received. More than 1150 comments were recorded.
- Views were sought from representatives of large scale commercial shipping, port based operations, owner operators, passenger and non passenger services, fishing, aquaculture, recreational boating organisations, charter vessels, construction, small boat operators currently operating under Part 35, training organisations, examiners, industry bodies and local government, as well as representative organisations and relevant government departments.
- Interviewees included operational managers as well as certificate holders, including skippers, deck and engineering personnel.
- In addition to gaining valuable insight to problems and challenges with existing qualifications and the operational limits linked to them, MNZ gained an understanding of the environment in which certificates are obtained, how MNZ syllabuses are delivered, access to training, availability of funding and consistency of standards in the current examination process.

KEY ISSUES AND COMMENTS

The community engagement programme confirmed the breadth and diversity of maritime operations in New Zealand and highlighted a number of key issues with existing qualifications and operational limits that are causing concern in the wider maritime community. Some of these issues are sector specific while others cross all industry sectors (Refer Appendix 3 for issues by industry sector).

The key issues and suggestions for change documented in this report are representative of the concerns expressed by participants in the community engagement process. A large number of people were spoken with and this report attempts to summarise the most frequently held views. Obviously not everyone holds the same opinions and so individual views may not be specifically recorded in this report. However, all views have been logged and recorded by MNZ and will be considered at the design stage.

Key issues

The major issues identified in the community engagement programme are summarised here under specific topics: barriers to entry to the industry, career progression, qualifications, engineering, endorsements, sea time, operational limits, revalidation, syllabuses, training, industry specific training under Part 35, examinations and application of STCW.

For each topic, issues and comments are presented as follows:

- Key issues
- Summary
- Positive comments
- Issues
- Suggestions for change by maritime community
- Case example – for some issues, examples given in interviews are included to illustrate problems and challenges with current qualifications and operational limits.

Please note that the number of issues listed under a particular topic does not necessarily reflect the importance of that issue relative to other issues.

Barriers to entry

Key issue

- Entry to the commercial maritime sector is constrained by the lack of recognition given to experience and skills gained in both the commercial and recreational sectors.

Summary

Lack of clarity about recognition of prior commercial learning and experience, and recreational qualifications and sea time, present barriers to entry into the commercial maritime sector.

Positive comments

- Nothing specific stated

Issues

- Recreational qualifications and experience are not appropriately recognised.
- Recreational sea time is not counted as equivalent to commercial sea time.
- Recreational boaties should be required to hold a qualification.

Suggestions for changes by maritime community

- Instead of constraining entry to the commercial industry to specific commercial experience and existing commercial qualifications, a much broader recognition of “qualifications” should be considered, for example:
 - recognise Coastguard Boating Education certificates as a base for commercial qualifications
 - recognise Royal Yachting Association (RYA) qualifications as a base for commercial qualifications; particularly practical boat-handling courses
 - recognise Nautical Institute Square Rigged qualification as an endorsement for commercial qualifications
 - recognise Yachting New Zealand sail training qualifications as endorsements for operation of commercial sailing training vessels.
- The role of MNZ should be to focus on examination of the competencies of candidates rather than where they gained these competencies. This would assist with encouraging people into the commercial maritime sector.

Case example

An experienced yacht skipper in a global round the world race responsible for crew and passengers, navigation, engineering, preparations, safe operation of the vessel and maintenance and repairs, but sailing under race rules without an engine (engine is onboard but not used for passage making), is not able to claim commercial sea time despite multiple entries into international ports, complex navigation and skippering responsibilities. This experience is considered less valid than commercial experience as a deckhand on a New Zealand commercial vessel due to the supposed lack of an engine. His RYA qualifications are not recognised in New Zealand.

Career Progression

Key issues

- It is not easy to plan a career that spans multiple industry sectors and know from the outset what experience or qualifications will be required at each stage.
- The current qualifications framework and career path do not recognise a separate and specific “inshore industry”.

Summary

Most concerns related to domestic qualifications and operations. A large number of people suggested that there is no clear career path that is available to new entrants who wish to progress to their chosen profession. Also, there is no recognition in the current framework for progression within the significant inshore industry. In addition, the current structure does not easily provide for people wishing to change

careers and transfer between commercial sectors, eg, fishing to passenger, naval to merchant, sailing to passenger/non passenger, etc.

Positive comments

- The career path for merchant mariners is well understood and there were limited comments made on this area of the existing qualifications.
- The career path for people progressing to the deep sea fishing industry was generally supported and well understood.
- Each sector requires specific competencies and it is fair and reasonable to expect to do additional training or gain experience in these specific areas.

Issues

- Pathways between commercial qualifications are not clear or, at least, are not well understood. It is not easy to plan a career that spans multiple sectors and know from the outset what experience or qualifications are required at each stage. Nor is it clear what prior learning and experience are acceptable at each stage.
- There are unnecessary barriers for people wishing to transition between sectors, eg, from navy or fishing to merchant shipping. The system is biased towards merchant mariners and insufficient recognition is given to skills and sea time acquired in other sectors.
- The current certificate structure appears to assume career progression which involves working on vessels further and further from the coast. This is only one possible career path and a significant volume of the New Zealand commercial sector operates solely within inshore limits.
- There is no logical career progression for the inshore industry above ILM for larger boats or vessels carrying greater numbers of passengers.
- The progression from ILM to NZOW, requiring up to 6 months coastal sea time or time as skipper on vessels more than 10 m in inshore area, is seen as a significant barrier for seafarers and operators who are, and will continue to work, exclusively in the inshore area.
- For seafarers who have been working or operating for a considerable period of time with a specific qualification, there is a sense that only “courses” count and not enough consideration is given to practical experience on the water. This is a particular concern for holders of older qualifications who fear that any change to a new qualification will require more schooling and won’t recognise their “on the job” learning and practical experience.
- Qualifications and career progression are focused on sea time, rather than proof of experience, knowledge and competence.

Suggestions for changes by maritime community

- Develop a system based on building blocks of learning and experience which make it clear what skills and experience are required at each step in the process.
- Introduce an endorsement concept to recognise skills of people in specific industries.

Case examples

Mr Z started in the navy as an able seaman for two years and had good seamanship and task books to prove his experience. He moved to fishing but was only allowed to cross credit a small percentage of sea time and training. There was no recognition of his seamanship skills; he believes he should only have had to up-skill the fishing element. He then moved to be an able seaman in the merchant navy and had to do more qualifying sea service and repeat seamanship activities he was already experienced in. He then moved to commercial fishing and needed coastal sea time so he had to go to a factory ship and take a step back as a deckhand to get required sea time. At this stage he gained his Coastal Masters qualification although he had limited or no time on the bridge. He accepts he really needed to spend time on deck and on the bridge to get the skills required. MNZ advised on day of the exam that the sea time he had gained did not qualify. Once he managed to get his Coastal Masters qualification he applied for a home trade endorsement which he obtained. There is uncertainty about what he is allowed to do with this qualification. He feels that just because he has got the qualification it does not mean that he has the competence to operate a large vessel, and wouldn't do so without more experience, even though he is entitled to.

Qualifications

Key issues

- Quality of qualifications must be retained.
- Current qualifications and operational limits are focused on sea time rather than experience and competence
- Qualifications and syllabuses have not kept up to date with new technology advances in engineering, navigation and communications.
- There are problems with getting domestic and super yacht qualifications recognised overseas.
- There is no appropriate qualification for small work boats operating in either very restricted or multiple areas.

Summary

Retention of the quality of qualifications in any new framework is a key concern across all qualifications as is ensuring ongoing respect internationally for all New Zealand qualifications. ILM is seen as the core qualification at the heart of many commercial operations in New Zealand and it is perceived that there are no appropriate higher level qualifications suited to the domestic industry above ILM. For operations using small craft infrequently, either in aquaculture, construction, research, etc, there are no qualifications which meet their basic safety requirements. (See Engineering and Endorsements topics for more specific comments on qualifications.) There are issues with recognition of domestic qualifications overseas. Sometimes this is due to the information that is provided on the actual certificate of competence issued.

Positive comments

- Quality of qualifications must be retained in any new framework.
- Deep sea fishing qualifications are considered appropriate for the job.
- Qualifications for mariners working in the unlimited sector are appropriate for the job.
- Most operators from small to large and across all maritime sectors undertake significant internal training programmes to provide specialist skills, knowledge of vessels, knowledge of operating areas and knowledge and competencies for a particular business operation. In effect, the industry is providing specialised training to enhance competence and skills.

Issues to be addressed

- There is a general lack of clarity and understanding about what some qualifications entitle the holder to do and where they can operate, particularly older qualifications.
- LLO is restrictive for some operators who need to be able to work on a national basis and not be limited to a few nominated areas, eg, aquaculture, construction and oil spill response operators.
- LLO is restrictive due to sea time requirement, especially for operators performing ad hoc and infrequent activities, eg, construction, workboats, ship-to-shore water taxis, operations on lagoons.
- LLO is restrictive in multi-boat operations by specifying vessels and not recognising vessels of same design.
- CDH is not meeting industry needs due to length of time it takes to complete the structured training programme – people move directly to ILM.
- There is a demand for a new qualification equivalent to the old NZCM fishing qualification.
- Integrated Rating (IR) qualification is not recognised overseas.
- NZOW is not an appropriate qualification for vessels carrying larger numbers of passengers in inshore limits.
- Portability of domestic qualifications, especially with Australia, is not working well - qualifications and certificate documents need to be effective to allow people to work overseas.
- What is printed on a certificate has a direct bearing on the recognition of the qualification overseas, eg, lack of reference to STCW, reference to unit standards, or use of words like New Zealand in NZOM.
- In the super yacht industry there are issues with portability and international recognition of New Zealand super yacht qualifications and other domestic qualifications.

Suggestions for changes by maritime community

- Review the limit of 99 passengers in inshore limits as the threshold for higher qualifications.
- Deal with higher numbers of passengers through crewing levels rather than higher qualifications.
- Align STCW syllabus with overseas administrations so qualifications are recognised internationally.
- Bring back the old NZCM certificate.

Case example

A water taxi of 16 m and with in excess of 99 passengers in the inshore area is required to be skippered by a person holding an NZOW qualification. Below 99 passengers an ILM certificate is adequate. For most of the year the operator has well below that number of passengers on board but in the peak season will frequently have more. To meet current maritime regulations the skipper must leave the operation and gain coastal sea time and attend a seven week course or accumulate required sea time at a ratio of 1:4 in the inshore area. This means the operator has to backfill the normal skipper's role while that person is away gaining sea time and qualifications and then may have to pay a higher salary in recognition of the higher qualification.

Engineering

Key issues

- The current link between distance offshore and level of engineer required is not appropriate and has a high cost impact on operators.
- The engineering syllabus for MEC 4, MEC 5 and MEC 6 is out of date and not appropriate for smaller vessels and modern engines.

Summary

Most of the issues about engineering qualifications relate to domestic qualifications and focus on the relevance of the syllabus, advances in engine technology and the impact of crewing level requirements for MEC 4 beyond 100 nm offshore.

Positive comments

No significant issues were raised regarding the higher level engineering qualifications required for international shipping, including MEC 1, MEC 2 and MEC 3.

Issues

- Appropriateness and relevance of MEC 5 and MEC 6 for various classes of vessel and limits.
- The crewing requirement for a higher level MEC 4 engineer is inappropriate for vessels that operate beyond 100 nm for short periods of time, either as a result of transiting between two limits or to operate for short periods outside normal operating areas. The practical implication of this is that the existing engineer has to be replaced for a period, increasing risk to the vessel and crew since a new engineer is not familiar with the engines or equipment on board. It can also duplicate costs and accommodation requirements.
- Requirement for more qualified engineer for coastal work/increased vessel length is not relevant.
- The current syllabus for MEC 4, MEC 5, and MEC 6 is out of date and not relevant to modern engines and the type of repairs or maintenance that can be carried out on board. Problems cited include inability to access engines on some modern vessels, having twin engines reducing risk and the need to undertake repairs at sea, and engine warranties that prohibit some degree of engineering work on "in warranty" engines.
- The current engineering syllabus for MEC 4, 5 and 6 does not include a practical component or have a sufficient focus on maintenance and preventative maintenance.
- The current 750 kw and 3,000 kw (single engine) size limit which drives the need for a higher qualified engineer does not take into account the increasingly powerful engines on modern vessels and possible changes in engine size on vessels in the future.
- Inclusion of "systems" which are more for the purpose of supporting operations, such as refrigeration and air conditioning, in decisions about the level of engineer required on board is not reasonable as this unnecessarily raises the level of qualification required by the engineer.

Suggestions for changes by maritime community

- The current approach which defines the number of “systems” as a measure for determining the qualification required should be limited to systems that are related to safety and propulsion, and the ability of a skipper to get a boat back to base.

Case example

Fishing vessel A wishes to do six trips a year in the offshore area but normally operates in the coastal area or within 100nm of the coast in the offshore area. It has an experienced MEC 5 on board who is familiar with the vessel, undertakes the maintenance and understands the history of the engine and systems on board for most of the year. For the trips beyond 100nm in the offshore area this engineer is required to be replaced by a new engineer with MEC 4 to meet the maritime rules. This more qualified engineer meets MNZ requirements but is not familiar with the vessel and may have experience with a different type of engine and will not necessarily be able to quickly diagnose a problem and resolve a breakdown. The experienced local engineer is adequate for areas closer inshore where the risk of being driven ashore if an engine problem is not resolved is greater than if offshore.

Endorsements

Key issues

- Endorsements should be used as a means of demonstrating competence for specific skills, experience and types of operation.
- ILM is the core qualification at the heart of commercial operations in the industry in New Zealand but does not provide sufficient competence for the higher end privileges of the ILM qualification.

Summary

ILM is seen as the core qualification at the heart of commercial operations in the domestic industry but does not provide sufficient competence for the higher end privileges of the ILM qualification. A consistent theme from skippers, engineers and operators alike was that some kind of endorsement system should operate in the same way as “type ratings” are applied in the civil aviation industry and “classes” are used in the motor and trucking industries to allow for the risks associated with operating different types of vessel or different business operations.

Positive comments

- Most operators, from small to large operations and across all maritime sectors, undertake significant internal training programmes to provide specialist skills, knowledge of vessels, knowledge of operating area and knowledge and competencies for a particular business operation. In effect, the industry is providing this specialised training to enhance competence and skills.

Issues to be addressed

- ILM is a basic qualification and the skills provided for by the syllabus are insufficient for larger, higher risk and more specialised vessels. The training and experience required to obtain an ILM is seen by many in the industry as a starting position, providing the basic navigational and engineering skills required rather than demonstrating competence across the breadth of vessels and operations that can be taken by a holder of an ILM certificate.
- ILM certificate holders are entitled to operate any type of vessel without currently acquiring any specific training to ensure the safe operation or manage the risks associated with that specific vessel.
- ILM certification does not provide any method for recognising ongoing learning and experience for specialisation in different craft, eg, sailing, tug and tow, square rig, harbour tug, fast ferries, parasailing, waka or for carrying a large number of passengers.

Suggestions for changes by maritime community

- Expand the number of endorsements to acknowledge and record specialist skills. This would help employers with selection of candidates for roles and provide seafarers with a formal

record of their skills and achievements (potentially useful both within New Zealand and overseas).

- MNZ should consider an approach which recognises in-house training as the method by which specialist endorsements are achieved. This would recognise the practicality of providing training for vastly different operations and boats, ranging from tugs to fast ferries and small fishing vessels to sailing vessels.
- MNZ should recognise the role of industry and safety management systems in self regulating and providing additional training and added competence above ILM for particular operations.
- Provision of basic safety training under STCW could operate as an endorsement to make a domestic qualification internationally portable. This would ensure that STCW international obligations would not be imposed on all qualification holders.
- Any proposed approach for introduction of endorsements should not significantly increase administrative overheads and costs. The benefits for operators and individuals need to outweigh any costs.

Case example

A holder of an ILM qualification, who has gained experience and sea time on small passenger or fishing vessels, is qualified to be the master of a ferry of any length in Auckland harbour (enclosed limits) carrying an unlimited number of passengers with no specialised training in crowd management, passenger safety, communication with passengers during an emergency, crisis management and human behaviour.

Sea time

Key issues

- The current method of calculating sea time is open to abuse and does not ensure “quality sea time” is obtained.
- Coastal sea time is hard to get and is a barrier to obtaining the NZOW qualification, in particular, when required for inshore operators.

Summary

The validity of sea time as a measure of competence was raised as an issue consistently across all industry sectors and across the country. While there was some discussion about the amount of sea time required, the duration of sea time for each qualification was largely seen as acceptable. It is well recognised that sufficient quality sea time is a key contributor to achieving competence. The biggest issue is the perception that people are obtaining qualifications by falsifying sea time records or without any “useful” sea time experience. To use a frequent quote – “you can get your sea time by making tea on a ferry and passing the line over the bollard occasionally, or working on in the factory deck of a trawler”. For people progressing up the career path or operators required to hold higher qualifications due to crewing requirements, the single biggest operational issues are the need for, and ability to obtain, coastal sea time.

Positive comments

- Quality sea time is key to ensuring competence.

Issues

- Appropriate coastal sea time is hard to get and is a barrier to obtaining the NZOW qualification. There is such a limited coastal industry that there are limited opportunities to obtain this time aboard vessels >10 m, and coastal time is not relevant for the inshore industry.
- Appropriate coastal sea time is hard to get and is a barrier to obtaining the NZOM with STCW endorsement because there are limited opportunities to obtain this time aboard vessels >24 m and 100 GT.
- There is no recognition that inshore sea time can be as valuable as coastal sea time and requires more complex navigation, watch-keeping and management of near coastal hazards, bars and port and harbour entry.
- Current constraints, such as vessel size, eg, >24 m in inshore limit, requires coastal sea time which makes it difficult to get sea time without leaving your operation.

- Sea time is not validated and the method of self declaration is open to abuse. People claim sea time that is not useful, eg, workers in factory fishing boats who never work on deck, deckhands who don't have an opportunity to keep watch or navigate, etc.
- Recreational sea time is not appropriately recognised and should be worth more than the current ratio of 1:4. Much useful experience gained recreationally is ignored.
- The constraint on claiming sea time being restricted to motor driven vessels is not appropriate.
- Deckhands and engineers cannot accumulate sea time on non self-propelled vessels, even when these vessels are highly complex and have significant "systems" on board. This makes it difficult to recruit people to the role and is a barrier for career progression for people operating on these vessels.
- Recent amendments which removed foreign going sea time requirements for Master Foreign Going (MFG) are inappropriate and reduce the quality and skills of MFG.
- One month local sea time for LLO is an employment barrier for organisations recruiting short term/seasonal staff, particularly the tourism industry.
- There is insufficient recognition of some harbour/land based activities towards sea time, eg, shore based time when heavily involved in a maritime role such as marine managers, work done in ports and some land based fishing responsibilities.

Suggestions for changes by maritime community

- A more formal MNZ mandatory record book of sea time would assist with determining quality of sea time.
- MNZ should allow remission of sea time if structured training/task book undertaken.
- Allow people to take courses and examination prior to completing all of the required sea time to allow flexibility and accommodate the limited number of courses available annually.

Case examples

Workers on the factory deck of a fishing trawler can claim sea time although they do no external deck work and gain no watchkeeping experience.

An engineer operating on board a complex non propelled dredge is not able to claim sea time because there is no propulsion system. However, the plant may contain systems equivalent or more complex than another propelled vessel. The plant may have heavy hydraulics, high powered pumps and crane engines, ballast pumping and high volt electrics, etc. It is difficult to employ engineers on board because their time does not count as sea time and so they prefer to work elsewhere.

Operational limits

Key issues

- There is a high demand for a 100 nm fishing limit to be reintroduced to align more appropriately with fishing areas, eg, 200 metre contour.
- **The current 12 nm inshore limit is based on the territorial limit and does not allow for practical transit routes between locations.**
- **The inshore limit does not take into account increases in vessel speed and technological advances in navigation and engineering that make it possible to travel further from the coast and still be able to access a safe haven.**
- **There is no flexibility to allow vessels to operate beyond the limits of their qualification for specified periods to suit certain fisheries or other activities.**
- Passenger/non-passenger and fishing operators wish to operate within the offshore limit to the extent of the Exclusive Economic Zone (EEZ).

Summary

Operational limits were widely discussed across a broad range of industries and it is apparent that a number of operators work outside MNZ limits for short periods of time for fishing activities, to transit from one area to another, or other ad hoc operational reasons. Very clearly, operators and skippers wish to work within a legal limit and are uncomfortable with not obeying MNZ rules. The importance of managing their legal responsibilities and ensuring insurance coverage are key drivers for them. While many operators are happy with the operational limits they work within, there is an overwhelming

demand from commercial fishermen for a return of a 100 nm limit to more closely align with commercial fisheries.

Positive comments

- Inshore and enclosed limits work well for a large number of operators.
- Offshore limits are not an issue for unlimited fishing operations.
- Operators and skippers want to comply with MNZ regulations.

Issues

- The current restriction on crossing Cook Strait within inshore limits unnecessarily constrains non-passenger vessels and should be reconsidered.
- There is no incentive for holders of CLM qualifications to upgrade to ILM because the older CLM qualification provides greater operational limits based on extreme limits, whereas ILM restricts holders to inshore limits.
- Passenger/non-passenger and fishing operators wish to operate within the offshore limit to the extent of the Exclusive Economic Zone (EEZ)
- The current strict adherence to the 12 nm limit makes it difficult to access some areas and transit between some areas legally without going out of the way, eg, White Island, Tasman Bay, Queen Charlotte to Port Underwood, Codfish Island to Solander Island.
- Reintroduce 100 nm limit to ensure that limit includes 200 m contour line (95% of inshore fishing is carried out within 200 m contour).
- There is no flexibility to allow vessels to operate beyond the limits of their qualification for specified periods to suit certain fisheries, eg, tuna and orange roughy, and to enable access to key fishing areas such as the Challenger Plateau or Wanganella Bank.
- The inshore limit does not take into account increases in vessel speed and technology advances in navigation and engineering that make it possible to travel further from the coast and still be able to access a safe haven.
- MNZ does not recognise the increased safety factor by being further offshore – “It is more dangerous close to the beach so don’t need higher qualifications to go coastal or require coastal sea time”.
- There is confusion about transiting between adjacent inshore limits and the crewing and qualifications required. It is unclear in this situation if a vessel is operating in inshore limits or restricted coastal limits.
- Operational limits currently do not recognise the need for one-off, specified, very restricted limits with associated simple qualification and minimal sea time for operations such as aquaculture, marinas, construction industry, ship to shore water taxis.
- Enclosed and inshore operational limits currently do not allow flexibility for one-off, infrequent requirements to operate outside the area with the same qualification, eg, water sampling outside harbour mouth.
- Current operational limits around Auckland Islands do not allow vessels to fish scampi quota and are in conflict with designated MFish protected marine reserve. (The inshore limit is currently 12 nm around Auckland Islands but vessels are not allowed to fish within 12 nm.)
- Reconsider enclosed limits to ensure that pilot vessels and tugs can operate within the pilotage limit.

Suggestions for changes by maritime community

- Rather than issuing exemptions, implement a system that allows flexibility to operate with existing qualifications outside standards limits based on a safety case approach for one-off or infrequent operational requirements, eg, water sampling in inshore limits, fishing outside 200 nm, construction projects such as pipelines.
- Amend inshore limits to take into account access and transit routes rather than adherence to a theoretical line.
- Operational limits should be based on risk rather than just distance offshore.
- Recognise individuals’ experience as a means of determining operating limits.
- Extend inshore limit further offshore from 12 nm to 25 – 30 nm to recognise the increased speed of vessels and ability to go further from coast and return quickly to a safe haven.

- Allow limits to be extended temporarily for operational reasons through an assessment of experience and suitability of the operator and vessel carried out by a local industry panel, eg, MSI, peer, SSM surveyor.
- Align the offshore limit with the EEZ.

Case example

The offshore limit extends 200 nm off the West Coast of New Zealand, but 600 nm off the East Coast (200 nm east of the Chatham Islands). The offshore limit does not allow vessels to go to the Bounty, Antipodes or Campbell Islands although they are the same distance, or closer, to the mainland of New Zealand than the Chatham Islands.

Revalidation

Key issues

- **Any changes regarding revalidation must consider the impact, costs and benefits and demonstrate that there is a safety benefit.**

Summary

Feedback emphasises that the focus of revalidation should be on ensuring people are up to speed with safety, obligations and maritime rules and should not require people to “go back to school” or repeat basic skills. There is some confusion about when revalidation will be introduced and what revalidation will mean. This arises from confusion between the current rules update programme and this QOL Review project. Most people believe regular medical and eyesight checks are a reasonable requirement for revalidation. A significant proportion of people feel revalidation of some sort may be appropriate for people who have been outside the industry for a while, but should not be applied or at least not be onerous for people consistently working in the maritime sector. People fear that revalidation will mean having to attend lots of courses which will be expensive and a challenge for individuals who have not been in a classroom environment for a long time.

Positive comments

- Revalidation is acceptable if the effort to undertake it is minimal.
- Revalidation forces people to maintain sea time and currency and therefore is positive for the industry, eg, existing LLO requirement to revalidate every five years.
- It is reasonable to be required to undertake medical and eyesight tests regularly, as it is of benefit to the individual as well as the industry.

Issues

- Revalidation currently does not require people to demonstrate proof of quality sea time or relevant sea time. It is hard to prove sea time for revalidation - there are no checks on engine hours to confirm sea time or measure experience.
- Revalidation is not required because companies decide if someone is capable of a role through their recruitment and training programmes, regardless of whether or not MNZ expands revalidation requirements.
- It is difficult as a marine manager or other land based maritime occupation to gain sufficient sea time to remain valid. Shore based people are losing sea time in a desk role although they may be educating others, doing chartwork, managing navigational aids and lights and managing fishing vessels. etc.
- Introduction of revalidation should consider domestic qualifications and not just adhere to SOLAS/unlimited requirements. Twelve months sea time in five years is too much for domestic operations. Sea time for revalidation should be minimal for domestic qualifications.
- Revalidation does not include reconfirmation of collision regulations and buoyage, etc, and should do.
- Cost of revalidation for bigger companies, where there are a lot of skippers with NZOW, NZOM and ILM, will add a significant annual cost for the company even if it is only the licence revalidation cost. If additional training is required this will increase costs further.
- Carefully consider the impact, costs and safety benefits of revalidation. Any courses for revalidation should be relevant to brush up on things that are likely to be used in the New Zealand operational context – tailored to need.

- Revalidation is a difficult process for skippers who are retired and can't get appropriate sea time.

Suggestions for changes by maritime community

- Some form of revalidation is required - MNZ should use the Safe Ship Management system to manage revalidation issues.
- MNZ should allow people who have not been able to maintain sea time for revalidation to revalidate with an examiner via a practical assessment either in lieu of or to replace some of the sea time. They may not have the recent sea time but they could still be very competent.
- First aid should be refresher course after two and a half years and a more comprehensive course required every five years.
- Revalidation should include medical/eyesight/Safe Ship Management, health and safety and a fit and proper person check on skippers in addition to owners and operators.
- Revalidation should include a module to manage safety issues relating to changes in technology and other operational aspects over time. Revalidation should apply to all qualifications and should include refresher courses and medicals.
- Revalidation could be managed by a half day seminar, eg, held locally by MNZ at no cost to holders of qualifications in addition to any currency, medical or eyesight requirements.

Case example

Under current maritime rule requirements the holder of a restricted limits Launchmaster's qualification who has been out of the maritime industry for many years could legally take command of a large passenger vessel that requires an ILM qualification regardless of lack of recent experience and state of health and eyesight.

Syllabus

Key issues

- Syllabuses are very out of date and too theoretical and do not reflect modern technology in engineering and navigation, eg, chart plotters, GPS, computerised engines, modern outboard motors.
- There is too much large merchant shipping influence on the syllabus for lower grade qualifications.
- There is a lot of repetition between the syllabus and courses for LLO, ILM and NZOW.

Summary

The consistent message from across the maritime community is that for domestic qualifications the syllabuses are repetitive and out of date and not relevant to domestic operations. People are frustrated because irrelevant syllabuses are a waste of time and come at a significant cost to course attendees in either course fees, accommodation costs or time away from family and work for extended periods.

Positive comments

- Nothing specific was stated.

Issues

- Syllabuses are very out of date and too theoretical.
- Syllabuses do not reflect modern technology in engineering and navigation, eg, chart plotters, GPS, computerised engines, modern outboard motors.
- There is too much large merchant shipping influence on the syllabus for lower grade qualifications; it is a waste of time and money to learn topics which are not relevant. Typical comments included "We don't want to learn about big ship engines for MEC 5".
- There is a lot of repetition between the syllabus and courses for LLO, ILM and NZOW.
- ILM engineering component is insufficient. It should focus on what people can actually do to maintain and manage modern engines.
- There is no focus on safety and emergency management, eg, SSM, H&SE in the ILM course.
- No practical content at all in ILM syllabus, eg, practical fire-fighting, boat-handling.
- There is no introduction to stability risks at ILM level.

- Including astro navigation in some qualifications is no longer relevant. The syllabus should recognise the level of modern equipment on board boats. This is a barrier for some people trying to obtain NZOM.

Suggestions for changes by maritime community

- Syllabuses must reflect competencies required for the qualification and/ or nature of operation.
- Syllabuses should be made up of building blocks that are not repeated, except as a refresher in subsequent qualifications.
- The following topics should be included in the ILM syllabus:
 - safety and emergency management, eg, SSM, H&SE
 - practical fire fighting, boat handling
 - introduction to stability.

Case example

The training course for MEC5 included detailed engineering principles designed for large ships but I operate a small vessel and I don't want to work on merchant ships and will never have to manage and maintain these types of large engines.

Training

Key Issues

- **Training is repetitive and does not recognise prior learning**
- **Individuals are required to repeat training unnecessarily as they progress through different certificates which makes training long and expensive.**
- **People find it hard to get on training courses at suitable times due to the limited number of courses.**
- **Courses are believed to be unnecessarily long to suit schools and government funding mechanisms, rather than candidates.**
- There is limited uptake of unit standards due to lack of understanding and misalignment of MNZ and NZQA qualifications.

Summary

A mix of unit standards and block courses are run. Most people attend a block course at a school to complete their training. For some this is easier to coordinate than doing training piecemeal and having more time away from their work. It is often difficult for people to find a course that fits in with their work commitments and when they have achieved their sea time. There is a widespread concern that courses are artificially long and expensive and are driven more by funding and commercial needs of schools than the dictates of the syllabus. Schools themselves recognise the challenges with funding and lack of alignment between MNZ syllabuses and the NZQA qualifications. Students may complete the course necessary to obtain a MNZ certificate but not necessarily complete the NZQA qualification. This affects training provider completion statistics and funding.

Positive comments

- Overall, schools do a good job based on the syllabuses provided.
- There is a benefit in attending training courses due to networking opportunities and mutual support from other students.

Issues

- Maritime and NZQA qualifications are not aligned.
- People are qualifying for ILM without competence in practical boat handling.
- Courses should recognise prior learning.
- Many organisations run significant internal training programmes to provide specialist skills over and above basic qualifications, especially ILM.
- Training is repetitive, eg, LLO and ILM, ILM and NZOM.
- Training providers have a motivation to pass people who don't have sufficient knowledge.
- There is a lack of availability of training courses and insufficient frequency of courses.
- Training for NZOW and NZOM is very costly and too long.

- For providers, the cost and effort of delivering unit standard training is higher due to the number of assessments involved.
- Funding mechanisms drive the cost and length of courses, in particular NZOW and NZOM.
- Courses are artificially lengthened to 12 weeks to allow students access to student loans.

Suggestions for changes by maritime community

- Allow a modular approach to training – build up components and minimise repetition of content.
- A structured training programme with a task book approach and appropriate sign-off, plus some course work, would be effective. This would need to be structured to be viable from a time commitment and financial perspective.

Industry specific training under Part 35

Key issues

- **Although Part 35 is a good scheme it imposes management overheads on participating organisations.**
- **There have been no regular audits of Part 35 by MNZ to ensure compliance and competence of trained candidates.**

Summary

Users of Part 35 qualifications (a training framework and approved organisations for industry specific training) find it a flexible and useful method of managing their vessels. It fills a need in the commercial sector for organisations where the current maritime qualifications are excessive for their safety requirements.

Positive comments

- Users of Part 35 qualifications find it a flexible and useful method for managing their vessels.
- Part 35 concept is working well for smaller vessels to deal with sea time and level of qualification required.
- For most organisations the 6 m passenger vessel length constraint is adequate for their needs.

Issues

- The current limit on vessel length may not be sufficient to cater for an increase in vessel length.
- Administrative overheads for managing Part 35 training in-house can be a burden to the organisation running the scheme.

Suggestions for changes by maritime community

- Increase size of Part 35 passenger vessel limit, eg, to 7.5 or 12 m.
- Part 35 should only be an interim step - people should have to get LLO or ILM once sufficient sea time is obtained.
- More regular reviews of Part 35 schemes are required to ensure they are operating effectively and managing competence to the required level.

Examinations

Key issues

- **There is no practical component to the examination process and therefore candidates don't have to demonstrate competence.**
- **Qualifications and syllabuses have not kept up to date with new technology advances in engineering and navigation, and examinations reflect this.**
- **Examination questions are sometimes theoretical and not relevant for domestic qualifications.**

Summary

MNZ manages quality of certification through a number of mechanisms including written and oral examinations for certificates of competence. Currently, examinations are undertaken on behalf of MNZ by a number of approved examiners. MNZ included the examination process as a subject for discussion in the review to ascertain whether this quality control mechanism is working effectively.

Overall, the oral exams are seen as an effective method of proving understanding of the syllabus and the common view is that they should be retained as a valuable and independent measure of competence. Some concerns were raised about the application process to sit exams but the basic principle of oral exams was supported.

Positive comments

- The concept of MNZ approved examiners is generally supported as long as examiners retain a high level of independence, particularly when they are also tutors at training establishments.
- Oral exams are seen as a good method for MNZ to test candidates' knowledge and experience.
- Generally, schools, employers and candidates are comfortable with the quality of the examinations.
- There is recognition that a qualification provides a range of privileges that an individual may or may not seek to take full advantage of, but that candidates should be tested appropriately for the level of privilege provided by the qualification.

Issues

- It is possible to obtain an ILM without having any competence in boat handling. There is no required practical training component for the LLO and ILM certificates and the examination process does not contain a practical component so there is no need to prove competence in boat handling skills.
- There is no practical fire fighting training as part of LLO and ILM qualifications.
- Possible difficulties with implementing a practical examination include determining type of vessel to be tested on, whose vessels would be used, who would undertake the test and the possible cost implications for examiners, schools and candidates.
- Questions asked in examinations are not always relevant to domestic qualifications (LLO, ILM and NZOW), the type of vessels to be operated, the nature of the industry and the role of the person being examined.
- Examination questions can be too theoretical.
- The application process to sit exams is time consuming and should be more efficient.

Suggestions for changes by maritime community

- MNZ should facilitate increased monitoring to ensure consistency of examiners and the examination process across the country.
- Examiners would benefit from getting together more formally and regularly, like surveyors, to ensure standards, consistency and a professional approach. This would help ensure that examiners remain up to date with any changes in the maritime rules and syllabus.
- Peer review and the ability for examiners to sit in on other oral exams in a more structured way would help ensure consistency of exams and outcomes.

Case example

It is possible to qualify as an ILM after gaining sea time working as hospitality staff on a passenger boat and have a sound theoretical knowledge but no practical seamanship or boat handling experience or skills.

Application of STCW- (standards of training, certification and watchkeeping)

Key issues

- The STCW basic safety training course which requires full fire training with breathing apparatus is excessive, expensive and provides no lasting benefit for operators on smaller vessels.

Summary

Currently, to trade internationally, qualifications for international vessels need to meet STCW standards. It is necessary for certificate holders to have completed basic safety training approved as part of the STCW convention 1978, as amended in 1995. In addition some domestic passenger and non passenger qualifications currently take into account standards found in STCW 1978 as amended in 1995. The need to impose STCW basic safety training on certificate holders, the syllabus and duration

of STCW safety training courses and portability of these qualifications (use of the qualification overseas) were raised in a number of the meetings held.

Positive comments

- STCW basic safety training is very relevant as it provides hands-on practical safety training and should be applicable to all levels of qualifications.
- Application of STCW standards to all domestic (non-fishing) qualifications would address questions of fatigue through prescriptive hours of work and rest.

Issues

- Not all New Zealand commercial seafarers intend to progress a career outside New Zealand. MNZ should not impose additional costs and effort on people who do not wish to use their qualifications elsewhere.
- STCW basic safety training is very relevant as it provides hands-on, practical safety training and should be applicable to all levels of non-fishing qualifications (currently it is only applied to NZOW and above).
- The full STCW basic safety training course which requires full fire training with breathing apparatus is excessive, expensive and provides no lasting benefit for operators on smaller vessels.

Suggestions for changes by maritime community

- STCW qualifications should be available for those who want international portability for their qualification but these requirements should not be imposed on all domestic operators.
- Ensure that the STCW course is appropriate to the level of qualification and the nature of vessels being used.
- MNZ should not seek to lead the international community in the application of the proposed STCW-F Convention (currently waiting for enough support to enter into force internationally).
- MNZ should put in a place a framework that can accommodate STCW-F without imposing unnecessary obligations immediately.

Other comments

Key issues

- **Communication on previous changes to rules and qualifications has not been effective or adequate.**
- **Interaction between the maritime community and the MNZ Licensing Team is not always satisfactory.**

Summary

In addition to comments on the qualifications and operational limits, other comments were received on the processing aspects of qualifications. The issues raised are listed below.

Positive comments

- MNZ's licensing team are helpful and sometimes delays and problems are the result of incorrect information being provided to them.
- Overwhelmingly, interviewees commented on the value of the community engagement programme and welcomed the opportunity to talk to MNZ about their business and their issues face to face.

Issues

- The process for recognising overseas qualifications is cumbersome and slow.
- Previous rules changes have not involved adequate and effective consultation.
- There has been a lack of information on previous changes to qualifications.
- The licensing process is not operating as efficiently as required and there has been some inconsistency in advice.
- It is often difficult to communicate with MNZ's licensing team.
- People have been disadvantaged financially in the past when unwanted changes to qualifications have been imposed upon them

Suggestions for changes by maritime community

- Leverage SSM system to put onus on operators to manage crewing rather than through regulation.

FEEDBACK

This report is a further opportunity for the maritime community to comment on the issues identified during the community engagement programme. It is important that all the major issues are captured prior to commencing the design stage of the project.

If you feel that any major issues have not been identified in this report please feel free to provide us with your concerns and feedback.

You can email queries or comments about the QOL Review to: qolreview@maritimenz.govt.nz

Please provide any comments to us by 1 March 2010.

For more information about the QOL Review please visit MNZ's website, go to www.maritimenz.govt.nz/quals-limits

WHERE TO FROM HERE

MNZ will commence detailed design work on a new qualifications and operational limits framework, once feedback has been received.

It is intended that a first draft of the new framework and a proposed approach to transition of existing qualifications to the new framework will be released for consultation in September 2010. MNZ will hold a roadshow in September 2010 visiting all major ports and regions to present the proposal. The consultation and roadshows will be widely advertised in advance. Sufficient time will then be given for the maritime community to understand and comment on the proposed framework.

Following this industry consultation, and based on the feedback received, the framework will be fine-tuned and further detail provided on transition strategies. The final proposal will be reviewed with representatives from each type of maritime operation. The new qualifications and operational limits framework is due to be published in March 2011.

APPENDIX 1 – GLOSSARY

CDH	Certificated Deckhand
CLM	Commercial Launch Master (older qualification)
H&SE	Health and Safety in Employment
ILM	Inshore Launch Master
IMO	International Maritime Organisation
LLO	Local Launch Operator
MEC (1,2,3,4,5,6)	Marine Engineering Certificate (Classes 1,2,3,4,5,6 – highest to lowest)
MNZ	Maritime New Zealand
Nm	Nautical Miles
NZCM	New Zealand Coastal Master (older qualification)
NZOM	New Zealand Offshore Master
NZOW	New Zealand Offshore Watch keeper
NZQA	New Zealand Qualifications Authority
Part 35	A training framework for industry specific training for approved organisations
QOL Review	Qualifications and Operational Limits Review
SOLAS	International Convention for the Safety of Life at Sea, (SOLAS) 1974
SSM	Safe Ship Management
STCW	International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978 as amended 1995
STCW – F	International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F) 1995

APPENDIX 2 – PARTIES INVOLVED IN CONSULTATION PROCESS

Organisation	Interviewees
Northland	
MNZ Maritime Safety Inspector	Hans Wetendorf
Mahurangi Technical Institute	Paul Dekker
Mahurangi Technical Institute	Frances Leonard
Mahurangi Technical Institute	John Read
Independent Consultant	Mark Rothwell
Reubens Cruises	Reuben Zylstra
Reubens Cruises	Laurence McLeod
Commercial fisherman	Dave Moore
North Tugz	Chris Wood plus 4 staff
Northland Harbour Master	Ian Niblock
Dive Tutukaka	Jeroen Jongejans
Dive Tutukaka	Evan Barclay
Dive Tutukaka	Luke Howe
Intercity Group Bay of Islands	Jason Steele
Intercity Group Bay of Islands	Charles Parker
Intercity Group Bay of Islands	Bronwyn Skyrme
Intercity Group Bay of Islands	Tammy Jameson
Kingfisher Yacht Charters	Steve Western
Hokianga Fisheries	Malcolm and Betty Pinkney,
R Tucker Thompson	Rachel Kennedy
Adventure HQ Limited	Darryl Honey
Explore NZ	Jim Whitehorn
Earl Grey Fishing Charters	Steve Butler
Flying Kiwi Parasail	Richard DeRosa
Te Tai Tokerau Tarai Waka Incorporated	Michael Harding,
Te Tai Tokerau Tarai Waka Incorporated	Hemi
Te Tai Tokerau Tarai Waka Incorporated	Jack Thatcher
Te Tai Tokerau Tarai Waka Incorporated	Julian Joy
Te Tai Tokerau Tarai Waka Incorporated	Stan Conrad
Charter Fisherman	Stef Railey
Auckland	
Professional Skipper	Keith Ingram
Spirit of New Zealand Trust	Paul Leppington
MNZ Maritime Safety Inspector	Chris Poulter
McCallum Bros Ltd	John McCallum
Charter operator	Mike Haynes
Charter Vessel Owner and Barge Operator	Alistair Reynolds
Charter operator	Gordon Ward
Coastal Fishing Vessel Owner/ Skipper	Andrew Turnwald
NIWA	Jim Drury
Aviation and Marine Engineers Association	Derek Craig
Aviation and Marine Engineers Association	George Ryde
Maritime Union of New Zealand	Gary Parsloe
New Zealand Maritime School	Tim Wilson
Competenz	Sriyana Warusavithana
Auckland Regional Council Harbourmaster's Office	Jim Dille
Auckland Regional Council Harbourmaster's Office	Mick Courtnell

Dunsford Marine	Kaz Aremka
Dunsford Marine	Bob Hawkins,
Dunsford Marine	Curly Hayter
NZ Fishing Guild	Peter McKinnon
NZ Fishing Guild	Preston MacIntyre
NZ Fishing Guild	Sean McCann
Thompson Towboats Ltd	Lance Thompson
MNZ Manager Recreational Boating	Jim Lott
Moana Pacific Fisheries	Tuck Destounis
Coastguard Boating Education Service	Neil Murray
Coastguard New Zealand	Bruce Reid
Coastguard New Zealand	Dean Lawrence
Lloyds Register	Bruce Maroc
Lloyds Register	John McDougal
Fullers Ferries	Doug Hudson
Fullers Ferries	Sean Patterson
Sealink	Andrew Lees
Sealink	John Monaghan
360 Discovery	Phil Andrews
FishSAFE mentor	Dave McIntosh
NZ Underwater	Bruce Carter
NZ Underwater	Grant Leighton
NZ Underwater	Andrea MacFarlane
Marine Transport Association	Alan Moore
Maritime Management Services	Margaret Wind
Heron Construction	Warren Harris
Heron Construction	Greg Kroef
Ports of Auckland	Nigel Meek
Ports of Auckland	Ben Evans
Ports of Auckland	Craig Colven
Ports of Auckland	Lorenz Ware
Ports of Auckland	Paul Gruzelier
Ports of Auckland	Martin Lee
PB SeaTow	Peter Dunlop
PB SeaTow	Ian Coombridge
McConnell Dowell	Roger McCrae
McConnell Dowell	Christian Nelson
McConnell Dowell	Stan Schwalger
MNZ MPRS Team	Nick Quinn
MNZ MPRS Team	Neil Rowarth
MNZ MPRS Team	Rob Service
MNZ MPRS Team	Scott Read
Sanford	Vaughn Wilkinson
Sanford	Martin De Beer
Te Tai Tokurau Tarai Waka Inc	Julian Joy
Te Tai Tokurau Tarai Waka Inc	Jack Thatcher
Te Tai Tokurau Tarai Waka Inc	Hotu Kerr
Maritime Police	Martin Paget
Maritime Police	John Kraka
Maritime Police	Graham Jacks
Royal New Zealand Navy	Jonathon Clow
Royal New Zealand Navy	John Fincham
Royal New Zealand Navy	Simon Gooder
Royal New Zealand Navy	Josh Dennis
Department of Conservation	Lionel Brock
Nautical Institute	Kees Buchen
Master Mariners	Tony Payne

Nautical Institute and Master Mariners Auckland	30 members
Yachting NZ	Andrew Clouston
Yachting NZ	Des Brennan
New Zealand Customs Service	Lyndon Cleaver
Ferry Skipper	John Brady
Waikato	
Taupo Harbour Master	Philip King
University of Waikato	Dudley Bell
Environment Waikato	Shelley Monrad
Taupo Lake Adventures	Nick Reed
Barbary Yacht Charter	David Nesbitt
Lake Taupo Charters	Graham Twiss
Taupo Launchman's Association	Chris Jolly
White Striker Charters	Richard Staines
Charter operator	Dan Basse
Top Cat Charters	Brian Novis
Coromandel Marine Farmers	Tom Hollings
Bay of Plenty	
MNZ Maritime Safety Inspector	Ian Clarke
Maritime Management Services	Roger Hawkes
Charter Operator	Les Porter
Fat Boy Charters	Russell Hawking
Jorgensens Marine Services	Carol Walker
Sea Quest Marine	Nicholas Gear
Pelco NZ	Peter Reid
FishSAFE mentor/inshore fishing Kotuku I	Colleen Kiddie
Bay of Plenty Polytechnic	Tim Lowe,
Bay of Plenty Polytechnic	Seamus McCann
Environment Bay of Plenty	Jennifer Roberts
Environment Bay of Plenty	Carl Magazinovic
Environment Bay of Plenty	Greg Meikle
Port of Tauranga	Nigel Drake
Port of Tauranga	Tony Hepburn
Port of Tauranga	Lars Sorensen
Port of Tauranga	Dale Waddingham
Port of Tauranga	Bob James
Port of Tauranga	Mike Selby
Port of Tauranga	Mike Hall
SGS	Hans Grimbergen
Blue Ocean Charters	Hugh Ensor
Marine Reach	Cees Bol
Marine Reach	Zanda Perano
Western Workboats	Sean Kelly
Braveheart and Claymore II	Nigel Jolly
Napier	
Port of Napier	Paul Hines
Port of Napier	Gary Neill
Port of Napier	John Paston
Port of Napier	Dean Dickey
Port of Napier	Tom Lovatt
Port of Napier	Gus Mattson
Port of Napier	Dani Oliver
Port of Napier	Andrew Hawthorne
Port of Napier	Scott Arnold
Port of Napier	Chace Rodda
Port of Napier	Richard Etheridge

Port of Napier	Todd Taylor
Port of Napier	Jeremy Brew
Port of Napier	George Hawkins
Port of Napier	John Pagler
Port of Napier	Garth Cowie
Gisborne	
Eastland Port	Rob Mitchell
Eastland Port	Paul Larson
Eastland Port	Karl Bennet
Eastland Port	Yorgo Atsalis,
Eastland Port	Garry Menzies
Hawkes Bay Regional Council	Charlie Rycroft,
Hawkes Bay Seafood	Harley Benton
Pacific Trawling	Bryan Hjorring
Gisborne District Council	Charlie Jamieson
Gisborne Fisheries	Salvatore Zame
Anchor Fishing	Tony Destounis
Charter Boat Pacific Invader	Michael Richmond
Charter Boat Touchwood	Dave Wallace
FishSafe Mentor	Daren Coulston
Taranaki	
Port Taranaki	Phil Kurta
Port Taranaki	Joe Govier
Port Taranaki	Adam Eager
Port Taranaki	Grant Squire
Port Taranaki	Peter Phear
Port Taranaki	Barry Govier
Port Taranaki	Mark Bamford
Port Taranaki	John Ireland
Port Taranaki	Hamish Thorpe
Port Taranaki	Neil McKean
Port Taranaki	John Taipari
Port Taranaki	Andrea Chadfield
Port Taranaki	Robin Smith
Chaddy's Charters	D Chadfield
MNZ Authorised Person	Chris Powell
Commercial fisherman	Ian MacDougal
Commercial fisherman	Mike Sharp
Commercial fisherman	Chris Davidson
Wellington	
Seafood Industry Council (SeaFIC)	Owen Symmans
Seafood Industry Council (SeaFIC)	Rolly Raurete
Wellington Harbour Master	Mike Pryce
Tertiary Education Commission	Ken Eastwood
East by West Ferries	Jeremy Ward
Strait Shipping	Clive Glover
Strait Shipping	Vikas Bangia
Maritime Union of New Zealand	Trevor Hansen
Maritime Union of New Zealand	Joe Fleetwood
Maritime Union of New Zealand	Gary Parsloe
Silver Fern	Andro Besich
NIWA	John Hadfield
NIWA	Fred Smits
CentrePort	Charles Smith
CentrePort	Lew Robinson
CentrePort	Paul Drake
CentrePort	Lew Henderson

Merchant Service Guild	Helen McAra
Maritime Police	John Bryant
Maritime Police	Dave Houston
NZ Shipping Federation	Sam Buckle
Inshore Fisherman	Kevin Tierney
Inshore Fisherman	Brendan Tierney
Master Mariners /Nautical Institute Wellington	Graham Williams plus 25 members
Seaworks	Chris Douglas
44 South Shipping	Steve Christianson
44 South Shipping	Dennis Nesbit
Tourism Industry Association	Evan Freshwater
MNZ Safety Auditor	Christiaan Moss
InterIslander	Peter Clarke
InterIslander	Brendan Wilson
Nelson/Marlborough	
Able Tasman Sea Shuttles	Paul Smith
SGS	Mike Hudson
Inshore Fisherman Seaspray	Andy Kenton
Inshore Fisherman vessel Skipper/Owner	Stu Morrison
Commercial fisherman and charter fishing	Tony Roach
Commercial fisherman	Grant Orr
Skipper Yonder Star	Grant Mitchell
SGS	Andrew Candler
Charter Fishing	Barry Bird
MNZ Maritime Investigator	Dominic Venz
MNZ Maritime Safety Inspector	John Auld
MNZ Technical Trainer	Darren Guard
Clearwater Mussels	Mike Holland
Elaine Bay Aquaculture	Jonathon Large
SGS	Dominic Harvey
Picton Harbour Master	Alex Van Wijngaarden
MNZ Maritime Safety Inspector	Colin Perkins
Beachcomber cruises	Tony Crapper
Chartlerlink	Tony Cooper
Marlborough Mussels	Dean Higgins
McManaway Tug & Barge	Peter McManaway
Cougar Line	Mark Evans
Sanford Aquaculture	Dave Herbert
Charlatan	Carolyn Church
Survey Nelson	Jean Reynolds
Harbour Master, Tasman District Council	Steve Hainstock
Talley's	Peter Talley
Talley's	Doug Saunders-Loder
Wilson's Water Taxis	Daryl Wilson
Wilson's Water Taxis	Shay Gill
King Salmon	Mark Preece
Johnsons Barges	Peter Johnson
Nelson School of Marine Studies	Katherine Walker
Fisheries Consultant	Simon Reid
Nelson Survey	Jean Reynolds
Nelson Survey	Terry Reynolds
Sealord	Colin Williams
Nelson Harbour Master	Roy Skucek
Nelson Harbour Customer Services	Troy Dando
Richardson Fishing	Richard Pollock
FishSafe Mentor	Gary Levy

FishSafe Mentor	John Cleal
Independent Consultant	Brian Rhoades
West Coast	
Commercial Fisherman - Westport	Ian McKenzie
Commercial Fisherman - Westport	Kevin Stephens
Commercial Fisherman - Westport	Malcolm Brace
Buller Port Services	John Taylor
Buller Port Services	Bruce Perkins
Buller Port Services	Ross Diskie
Buller Port Services	David Hughes
Buller Port Services	David Taylor
Buller Port Services	Peter McGrath
Buller Port Services	Lewis Holland,
Commercial Fisherman – Greymouth	Craig Jones
Commercial Fisherman – Greymouth	Tony Hartigan
Commercial Fisherman – Greymouth	Paul Watson
Commercial Fisherman – Greymouth	Adam Duff
Commercial Fisherman – Greymouth	Nathan Sulman
Commercial Fisherman – Greymouth	F. Benzie
Commercial Fisherman – Greymouth	Martin Thomas
Commercial Fisherman – Greymouth	Leo Horncastle
Commercial Fisherman – Greymouth	Stuart Thomson
Commercial Fisherman – Greymouth	Pete Coulston
Canterbury	
Regional Harbourmaster	Tony Whiteley
Lyttelton Port Company	Tom Veitch
Lyttelton Port Company	George Phillips
Lyttelton Port Company	Bryan Shankland
Lyttelton Port Company	Chris Robertson
Federation of Commercial Fisherman	Pete Dawson
United Fisheries	Brent Threadwell
United Fisheries	Tony Threadwell
Black Cat	Russell Thomas
Jack Tar Sailing	Mike Rossoux
Pacifica	Rod Grout
Sanford	Simon Gibb
Sanford	Greg Johansson
Sanford	Dave Woods
Sanford	Darryn Shaw
Sanford	Darren Thorp
PrimePort Timaru	Paul McNeill plus 7 staff
Commercial Fisherman	Raymond Mitchell
OdeyFish	Robert Odey
Black Robin Freighters	Kelvin Leslie
Otago	
MNZ Maritime Safety Inspector	Peter Dryden
Charter Passenger /non passenger	Mark Hammond
Commercial Fishing	Peter Scott
University of Otago	Bill Dickson
Port Otago	Hugh Marshall
Port Otago	Michael Kestila
Port Otago	Dwayne Lewis
Port Otago	Stephen Mac Donald
Port Otago	Kerry Davis
Port Otago	Dave Dick
Port Otago	Tony Lawrence
Port Otago	Michael Dewar

Port Otago	Kevin Finigan
Port Otago	Hugh O'Neill
Port Otago	Lex Lane
Port Otago	Jim Hawkins
Port Otago	Ray McDonald
Port Otago	Blair Bishop
Maritime Training Otago	Graeme Turner
Examiner	Matt Harger
University of Otago School of Surveying	Scott Preskett
Southland	
MNZ Maritime Safety Inspector	Dave Pollard
Master Mariner	Dave Henigan
Mana, Passenger Charter	Bob Hawkless
Real Journeys	Paul Pascoe
Bluff Marine Centre	Graham Denny
Commercial Fishing, Real McCoy	Graham Anderson
Real Journeys	Graham Cowley
Sanford	Warren Crighton
South Port	Mark Edmiston
South Port	Ian Goldsworthy
South Port	Owen Bennett
South Port	Dave Edge
South Port	Tony Campbell
South Port	Murray Black
South Port	Russel Slaughter
South Port	Shane Bryan
South Port	Ruslan Mitlash
South Port	Peter Topi
South Port	Bruce Jones
South Port	Robert Coote
Sanford – Aquaculture Division	Jason Eriksson
Sanford – Aquaculture Division	Alan Macdonald
Harbour Master Southland Regional Council	Kevin O' Sullivan
Real Journeys	Peter Bloxham
Milford Community Trust	William Mitchell
Milford Skippers	Andrew Murdoch
Milford Skippers	Dean Thompson
Milford Skippers	Kim Cormack
Milford Skippers	Neil McCulloch
Milford Skippers	Brad Johnstone
Milford Skippers	Richard Moore
Milford Skippers	Caleb Bloxham
Milford Skippers	Ian Huia
Milford Skippers	Kendall Phelps
Real Journeys	Paul Phelan
Real Journeys	Angus Small
Lakeland Adventures	Simon Stewart and Mrs Stewart
Queenstown Group Meeting	Graham Moore-Carter
Queenstown Group Meeting	Russ Morton
Queenstown Group Meeting	Peter Greer
Queenstown Paraflights	Mark Evans
Queenstown Paraflights	Carrick McLellan

Written Submissions

Organisation	Written submission
1. Master Mariner	Jim Varney
2. Non Passenger	Clive Bray
3. Maritime Tutor	Peter Usher
4. Skipper FV Independent 1	Chris Carey
5. Cascade Charter	Mike Boswell
6. Victoria University	James Allan
7. Dive Operator	Robert Feist
8. Fisherman and Authorised Person	R G Smith
9. Coastal Tug Master	Michael Slade
10. Local Launch Master	Tom Rutherford
11. Boating Industry Training Organisation	Jeff Cook
12. Ferrymead Fishing Club	Peter Rivers
13. Todd Energy	Jack Hutchings
14. Jack Tar sailing	Mike Rossouw
15. Seaworks Ltd (Wellington)	Dylan Knight
16. Commercial Diving Consultants Ltd & N-Viro Ltd	Mike Baker
17. Tierney Partnership Ltd	Kevin Tierney
18. Dunsford Marine	Bob Hawkins
19. Spirit of Adventure Trust	Paul Leppington
20. Recreational Fisherman	Daniel Cook
21. Fire and Emergency Training Solutions Ltd	Dave McPake
22. RYA/MCA Coastal Skipper	Jason Price
23. 44 South Shipping Co Ltd	Dennis Nisbet
24. Golden bay Cement	Graeme Bird
25. University of Waikato	Dudley Bell
26. Hokianga Fisheries	Betty Pinkney
27. Charlatan Ltd	Carolyn Church
28. Fat Boy Charters	Russ Hawkins
29. Centreport Ltd	Charles Smith
30. CPG New Zealand Ltd	Maurice Davis
31. Commercial fisherman	Paul Adams
32. Cerveza Charters	Dave Wooff
33. Tug Master	Don Reid

APPENDIX 3 – KEY ISSUES BY INDUSTRY SECTOR

Topic	Key issues	Aquaculture	Barge/Towing	Charter Fishing	Construction	Customs/Police	Commercial Fishing Inshore	Education and Research	Examiners	Harbour Masters Regional Councils	Industry Training Organisations	Navy	Non Passenger	Offshore Fishing and Factory Ships	Part 35 Operators	Passenger	Ports, Pilots, Tugs	Recreational	Safe Ship Management	SOLAS	Superyacht	Training		
Barriers to entry	Entry to the commercial maritime sector is constrained by the lack of recognition given to experience and skills gained in both the commercial and recreational sectors.	•		•	•							•			•	•		•				•		
Career progression	It is not easy to plan a career that spans multiple industry sectors and know from the outset what experience or qualifications will be required at each stage.											•	•	•	•	•	•	•					•	
	The current qualifications framework makes it difficult to transfer between sectors.			•			•					•				•	•				•		•	
	The current qualifications framework does not recognise a separate and specific “inshore industry” or provide a career path for it.	•		•	•		•									•								
Qualifications	Quality of qualifications must be retained.			•		•				•				•		•	•	•	•	•	•		•	
	Current qualifications and operational limits are focused on sea time rather than experience and competence.															•		•						
	Qualifications and syllabuses have not kept up to date with new technology advances in engineering, navigation and communications.		•	•					•					•	•	•		•					•	
	There are problems with getting domestic and super yacht qualifications recognised overseas.			•			•									•	•		•			•	•	
	There is no appropriate qualification for small work boats operating in either very restricted or multiple areas.	•			•			•		•			•		•	•	•	•						
Engineering	The current link between distance offshore and level of engineer required is not appropriate and has a high cost impact on operators.			•									•	•		•								
	The engineering syllabus for MEC 4, MEC 5 and MEC 6 is out of date and not appropriate for smaller vessels and modern engines.			•			•	•						•		•	•							

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Endorsements	Endorsements should be used as a means of demonstrating competence for specific skills, experience and types of operation.		•	•								•	•		•	•	•	•			•	
	ILM is the core qualification at the heart of commercial operations in the industry in New Zealand but does not provide sufficient competence for the higher end privileges of the ILM qualifications.		•	•								•	•		•	•	•	•			•	
Sea time	The current method of calculating sea time is open to abuse and does not ensure "quality sea time" is obtained.		•	•	•	•	•						•	•		•	•	•			•	•
	Coastal sea time is hard to get and is a barrier to obtaining the NZOM qualification, in particular, when required for inshore operators.	•	•	•		•	•						•	•	•	•	•					
Operational Limits	There is a high demand for a 100 nm fishing limit to be reintroduced to align more appropriately with fishing areas, eg, 200 metre contour			•			•															
	The current 12 nm inshore limit is based on the territorial limit and does not allow for practical transit routes between locations.	•	•	•			•						•	•		•						
	The inshore limit does not take into account increases in vessel speed and technological advances in navigation and engineering that make it possible to travel further from the coast and still be able to access a safe haven.			•			•							•	•	•						
	There is no flexibility to allow vessels to operate beyond the limits of their qualification for specified periods to suit certain fisheries or other activities.		•	•	•		•			•			•	•		•	•					
	Passenger/non-passenger and fishing operators wish to operate within the offshore limit to the extent of the Exclusive Economic Zone (EEZ)												•	•		•						
Revalidation	Any changes regarding revalidation must consider the impact, costs and benefits and demonstrate that there is a safety benefit.		•	•			•						•	•		•	•					

Topic	Key issues	Aquaculture	Barge/Towing	Charter Fishing	Construction	Customs/Police	Commercial Fishing Inshore	Education and Research	Examiners	Harbour Masters Regional Councils	Industry Training Organisations	Navy	Non Passenger	Offshore Fishing and Factory Ships	Part 35 Operators	Passenger	Ports, Pilots, Tugs	Recreational	Safe Ship Management	SOLAS	Superyacht	Training	
Syllabuses	Syllabuses are very out of date, too theoretical and do not reflect modern technology in engineering and navigation, eg, chart plotters, GPS, computerised engines, modern outboard motors.			•			•		•				•	•		•	•						
	There is too much large merchant shipping influence on syllabuses for lower grade qualifications.			•									•	•		•	•						
	There is a lot of repetition between the syllabus and courses for LLO, ILM and NZOW.			•			•				•		•	•		•	•						
Training	Training is repetitive and does not recognise prior learning.		•	•			•	•		•		•	•	•		•	•						
	Individuals are required to repeat training unnecessarily as they progress through different certificates which makes training long and expensive.		•	•			•	•		•		•	•	•		•	•						
	People find it hard to get on training courses at suitable times due to the limited number of courses.						•						•			•	•						
	Courses are believed to be unnecessarily long to suit schools and government funding mechanisms rather than candidates.		•	•	•		•					•	•			•	•						
	There is limited uptake of unit standards due to lack of understanding and misalignment of MNZ and NZQA qualifications.										•		•			•		•					•
Industry specific training under Part 35	Although Part 35 is well regarded it imposes management overheads on participating organisations.									•					•								
	There have been no regular audits of Part 35 by MNZ to ensure compliance and competence of trained candidates.									•					•								•
Examinations	There is no practical component to the examination process and therefore candidates don't have to demonstrate competence.		•	•		•	•		•	•			•	•		•	•		•				•
	Qualifications and syllabuses have not kept up to date with new technology advances in engineering and navigation and examinations reflect this.		•	•		•	•		•	•			•	•		•	•		•				•

	Examination questions are sometimes theoretical and not relevant for domestic qualifications.			•	•		•	•		•		•	•	•		•	•		•			
Application of STCW	The STCW basic safety training course, which requires full fire training with breathing apparatus, is excessive, expensive and provides no lasting benefit for operators on smaller vessels.			•			•						•			•						
Other	Communication on previous changes to qualifications and operational limits has not been effective or adequate.	•		•			•						•			•	•					
	Interaction between the maritime community and the MNZ Licensing Team is not always satisfactory.			•	•		•						•			•						