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## Summary of key issues Community engagement programme

1 February 2010

### INTRODUCTION

Here's a summary of the key issues identified in Maritime New Zealand's community engagement programme – the first stage of our qualifications and operational limits review (QOL Review).

This information will be used to help direct the design of an improved qualifications and operational limits framework, along with other key inputs including international standards and maritime obligations.

This is your opportunity to review these issues and ensure that MNZ has captured the industry's major concerns with the current framework before commencing design of the new one. If you think we've missed a key point, please let us know using the feedback channel outlined under "Your comments welcome".

For a copy of the full report go to [www.maritimenz.govt.nz/quals-limits](http://www.maritimenz.govt.nz/quals-limits)

### BACKGROUND

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 industry now and in the future.

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).

The outcome will be relevant qualifications and appropriate operational limits that meet industry needs while ensuring the safety of vessels, their crew, passengers and cargo, and protection of the marine environment.

### COMMUNITY ENGAGEMENT PROGRAMME

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

MNZ interviewed 434 representatives of the maritime community throughout New Zealand. They were asked what works and doesn't work with the current qualifications and associated operational limits and how they could be improved.

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 a clear understanding of the business and operational requirements of the various industry sectors, the discussions provided MNZ with valuable insight to 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.

More than 1150 comments were recorded and 30 written submissions were also received. These have been distilled into the key issues listed below.

MNZ wishes to thank everyone who took part in the QOL Review community engagement programme. The free and frank views shared by so many people will help ensure the new framework is firmly anchored to the needs of New Zealand's commercial maritime businesses.

## KEY ISSUES

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.

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 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.

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.

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. The validity of sea time as a measure of competence was raised as an issue consistently across all industry sectors and across the country.

Following is a summary of the key issues, presented under specific topics.

### 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 nautical mile fishing limit to be reintroduced to align more appropriately with fishing areas, eg, 200 metre contour.
- The current 12 nautical mile 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.

## YOUR COMMENTS WELCOME

In your opinion, do these key issues cover all the major concerns with the current maritime qualifications and associated limits? Do they accurately reflect the challenges of complying with the rules? Are there further changes you'd like to see?

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

You can email queries or comments about the QOL Review to: [qolreview@maritimenz.govt.nz](mailto:qolreview@maritimenz.govt.nz) or post them to:

**QOL Review Feedback**  
Maritime New Zealand  
PO Box 27006  
Marion Square  
Wellington 6141

**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](http://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 delivered in March 2011.