

Proposed Changes to Maritime Rules: Design, Construction and Equipment Rules Reform

Consultation Package 2

Section 1 Introduction

We would like to hear your feedback on the proposed changes to the existing Design, Construction and Equipment rules.

We encourage you to review the consultation material outlined below and share your feedback via one of the following methods:

- Completion of this submission form or in any other written form. See page 17 of this form for details on how to send us your written submission.
- Attendance at a Maritime NZ online information session during the weeks of 3 – 6 June and 23 – 27 June. Contact us at 40.series@maritimenz.govt.nz if you would like to attend a session.
- Verbally on request. Contact us at 40.series@maritimenz.govt.nz if you would like us to contact you to discuss the proposals.

The submission deadline is **5pm, Friday 11 July 2025**.

Consultation material

The consultation material consists of the following series of documents:

- *Invitation to Comment* - An overview of the consultation package and summary of the proposals, including information on how to have your say on the proposals.
- *Proposal summaries* - Details of the proposed changes for each of the four Rule topics being consulted on: Stability, Drainage, Freeboard, and Subdivision; Watertight and Weathertight; Electrical; and Radio Equipment.
- *Draft Maritime Rules and draft Maritime Transport Instruments (MTIs)* – a set of rules and MTIs for each of the four Rule topics.

All documents can be accessed at <https://www.maritimenz.govt.nz/public/consultation/dce-40-series-package-2/>

Section 2 Your details

Name

Email

**Organisation
(if applicable)**

**Position
(if applicable)**

Questions and feedback

Section 3 Questions about the general approach

In addition to the specific questions outlined in the following sections, you may also wish to comment on the following overview questions:

General approach

G 1 Do you have any comments about the general approach to reforming the DCE rules? (For example, harmonising and consolidating requirements across vessel types, basing requirements on risk, putting detailed requirements in MTIs, grandparenting of some requirements?)

Second-hand vessels entering the New Zealand fleet

G 2 Do you agree that a second-hand vessel that enters the New Zealand fleet should be treated as an existing vessel if it holds current certification from AMSA or a recognised classification society?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

G 3 Do you think the proposed approach to second-hand vessels entering the New Zealand fleet would have any negative impacts on the wider maritime sector or New Zealand? If so, what might these be?

G 4 When a second-hand vessel enters the New Zealand fleet with current certification from AMSA or a recognised classification society, do you agree that it should need to meet any upgrade requirements (e.g. safety or accessibility) at the point of entry? (An existing New Zealand vessel would need to meet those requirements after a transition period – e.g. five years).

Section 4 Stability, Drainage, Freeboard, and Subdivision Questions

Part A: The application of the proposed rules

Part B: The proposed new rules for stability, drainage, freeboard and subdivision

Proposal 1: New approach to categorising vessels and its impact on a vessel's stability requirements

Proposal 2: Stability assessment and documentation requirements

Proposal 3: Assigning and marking minimum freeboard

For information on these specific proposals refer to:

- Page 13 of the *Invitation to Comment* document
- Part 3B: Stability, Drainage, Freeboard, and Subdivision proposal summary

Part A: Application to existing vessels

SF Part A.1 How should the proposed new rules apply to existing vessels?

SF Part A.2 Do you agree that any or all of the additional considerations, set out in Figure 1, should be factored into the decision on how to apply the proposals to existing vessels? Are there other factors that should be considered?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Note: The reference to Figure 1 above refers to Figure 1 in the Policy Summary for Stability, Drainage, Freeboard, and Subdivision. The additional points to consider relate to applying the new requirements to existing vessel if they are a passenger vessel or if there had been a change in ownership; and requiring existing vessels to meet the general requirements.

Why / why not?

SF Part A.3 If you do not currently have stability information available, or do not have a freeboard mark or placard, how do manage any potential stability issues that could arise during the operation of your vessel?

Part A: Application to vessels new to the fleet

SF Part A.4 How should the proposed new rules apply to a vessel that is new to the fleet?

SF Part A.5 What type of stability information would a vessel that is new to the fleet likely to have?

Part B: The proposed new rules for stability, drainage, freeboard and subdivision

SF Part B.1 Do you agree with using the new approach, of categorising a vessel according to its complexity (high or low) and characteristics (open or decked), for determining a vessel’s stability, drainage, freeboard, and subdivision requirements?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

SF Part B.2 Do you agree with the thresholds for determining whether a vessel is high complexity? Are the thresholds set at the right level? Are there additional factors that could be considered?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

SF Part B.3 Do you agree with consolidating the terms used to categorise a vessel’s configuration and only using the terms open and decked? Do you agree how the distinction between an open and decked vessel is determined?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 1: New approach to categorising vessels and its impact on a vessel’s stability requirements

SF 1.1 Do you agree that the different types of stability assessments applied to a vessel, depending on its complexity and characteristics of the vessel, are appropriate?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

SF 1.2 Do you agree with the restrictions and limitations placed on open vessels?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

SF 1.3 Do you agree with allowing collared vessels, which have met the assessment requirements of a high complexity vessel, to proceed beyond restricted limits or inshore fishing limits if certain caveats have been met?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

SF 1.4 Do you agree with the estimated impacts (including costs) of the proposed changes?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 2: Stability assessment and documentation requirements

SF 2.1 Do you agree with the proposed changes to the stability tests and documentation requirements?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

SF 2.2 Do you agree with the estimated impacts (including costs) of the proposed changes?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 3: Assigning and Marking Minimum Freeboard

SF 3.1 Do you agree with the proposals for assigning and requiring high complexity vessels to have a freeboard mark or visual placard?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

SF 3.2 Do you agree with the estimated impacts (including costs) of the proposed changes?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Section 5 Watertight and Weathertight Questions

Proposal 1: Consolidating rules across vessel types and aligning with the NSCV-C2

Proposal 2: Changes to ventilators

Proposal 3: Changes to portholes

Proposal 4: Changes to protection for glazed openings

For information on these specific proposals refer to:

- Page 14 of the *Invitation to Comment* document
- Part 3C: Watertight and Weathertight proposal summary

Proposal 1: Consolidating rules across vessel types and aligning with the NSCV-C2

W 1.1 Do you agree with the proposed change to align watertight and weathertight requirements across different vessel types and with Australia's NSCV-C2?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 2: Changes to ventilators

W 2.1 Do you agree with the proposed change to allow for ventilators in the sides of ships (wall ventilators)?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 3: Changes to portholes

W 3.1 Do you agree with the proposed changes to allow opening portholes to be fitted to new vessels provided certain conditions are met including that they:

- are located as high as possible towards the freeboard deck;
- are not in a major fire hazard area or the forward quarter of the hull;
- are fitted with hinged watertight deadlights and are securely closed when the vessel is underway;
- have indicators on the bridge that indicate they are open or closed, if passengers are carried?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 4: Changes to protection for glazed openings

W 4.1 Do you agree with the proposal for glazed openings on new vessels operating beyond inshore limits or inshore fishing limits to be tested to 1.5 times their design pressure rating, or have deadlights or storm covers fitted?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

W4.2 Do you agree with the proposal for glazed openings on new vessels operating beyond inshore limits or inshore fishing limits to be subject to new construction and design standards specified in rules, rather than the discretion of a surveyor?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

W4.3 Do you agree with only applying this proposal to new vessels?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Section 6 Electrical Questions

- Proposal 1:** Specifying requirements for lithium-ion batteries
- Proposal 2:** Specifying requirements for electric propulsion
- Proposal 3:** Removing the requirement for existing vessels to comply with AS/NZS 3004.2, and specifying minimum electrical safety requirements as an alternative
- Proposal 4:** Changes to requirements to have an alternative source of electrical power
- Proposal 5:** New vessels with electric engine starting would require a dual battery system with a changeover switch
- Proposal 6:** Specifying responsibilities of operators, and persons who carry out marine electrical work

For information on these specific proposals refer to:

- Pages 14 and 15 of the *Invitation to Comment* document
- Part 3F: Electrical proposal summary

Proposal 1: Specifying requirements for lithium-ion batteries

E 1.1 Do you agree that the design and installation of Li-ion batteries should comply with AS/NSZ 3004.2 or classification society rules and be approved by an electrical surveyor?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 2: Specifying requirements for electric propulsion

E 2.1 Do you agree that electric propulsion systems should comply with the new version of AS/NZS 3004.2 or with classification society rules?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 3: Removing the requirement for existing vessels to comply with AS/NZS 3004.2, and specifying minimum electrical safety requirements as an alternative

E 3.1 Do you agree with the proposal to give operators of existing vessels an option to comply with a set of minimum electrical safety requirements specified in an MTI, as an alternative to complying with AS/NZS 3004.2?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 4: Changes to requirements to have an alternative source of electrical power

E 4.1 Do you agree that all vessels should have alternative sources of electrical power available for essential equipment (navigation lights, emergency lighting, radio power and light, electronic control systems and alarms, electrically powered bilge pumps)?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

E 4.2 Do you agree that alternative power circuits should be labelled on the switchboard so that non-essential circuits can be switched off in an emergency?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 5: New vessels with electric engine starting would require a dual battery system with a changeover switch

E 5.1 Do you agree that new vessels with electric engine starting should have a dual battery system with a changeover switch so that the engine can be started from either battery?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 6: Specifying responsibilities of operators, and persons who carry out marine electrical work

E 6.1 Do you agree that the duties of vessel operators, and persons who carry out marine electrical work should be clarified in the rules?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

E 6.2 Do you agree that the persons who carry out marine electrical work should issue a written statement confirming that the work they did is safe; complies with the Electrical Rules and MTI; is tested in accordance with the Electrical Rules and MTI; and complies with the electrical design approval, where one is required?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Section 7 Radio Equipment Questions

Proposal 1: On some passenger vessels the master will need to carry a means of communication

Proposal 2: EPIRBs

Proposal 3: Radio equipment requirements for dive boats and fishing boats operating under a SOP

For information on these specific proposals refer to:

- Page 15 of the *Invitation to Comment* document
- Part 3G: Radio Equipment proposal summary

Proposal 1: On some passenger vessels the master will need to carry a means of communication

R 1.1 Do you agree that the master of every passenger and sailing vessel of less than 12 metres in length that does not proceed beyond the inshore limit should carry a means of communication (cell phone, portable VHF radio or PLB) on their person?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Proposal 2: EPIRBs

R 2.1 Do you agree that more vessels in the fleet should carry an EPIRB?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

R 2.2 Should smaller vessels and vessels where it is impractical to carry a float-free EPIRB be allowed to carry a manually activated EPIRB?

Why / why not?

Proposal 3: Radio equipment requirements for dive boats and fishing boats operating under a SOP

R 3.1 Do you agree that Safe Operating Plan (SOP) dive boats and SOP fishing boats should meet the same radio communication requirements as other vessels of the same size and type operating in the same area?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

If you have any further comments you'd like to make on any of the proposals in this invitation to comment please use the blank pages at the end of this form.

Returning this form

Please return this form and any supporting information by 5pm on **Friday 11 July 2025**.

Email this form to: 40-series@maritimenz.govt.nz

Post this form to:

Regulatory Reform Projects Team
Maritime New Zealand
PO Box 25620
Wellington 6146

Courier this form to:

Regulatory Reform Projects Team
Maritime New Zealand
Level 11
1 Grey Street
Wellington 6011

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